COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF FLAT RUN SOLAR, LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 55 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY IN TAYLOR COUNTY, KENTUCKY, PURSUANT TO KRS 278.700 AND 807 KAR 5:110

CASE NO. 2020-00272

SITING BOARD STAFF'S POST-HEARING REQUEST FOR INFORMATION TO FLAT RUN SOLAR, LLC

Flat Run Solar, LLC (Flat Run Solar), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 17, 2021. The Siting Board directs Flat Run Solar 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 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

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).

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

Flat Run Solar shall make timely amendment to any prior response if Flat Run 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 Flat Run Solar fails or refuses to furnish all or part of the requested information, Flat Run 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, Flat Run 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. Provide the number of non-participating properties that are adjacent to the proposed Flat Run solar facility.

2. Explain if the 700 feet distance proposed in the motion for deviation refers to the substation only, or if this measurement include inverters, energy storage devices, and HVAC units as well.

a. Confirm whether the proposed 700 feet distance applies to the nearest residence of the nearest neighborhood for these items of equipment.

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b. Explain the discrepancy in the closer distances proposed in the Site Assessment Report for various equipment to the nearest residences and whether those residences are participating landowners, or if they are residences that fall within one of the neighborhoods bordering the project.

3. Provide the distance from the nearest project equipment to the three landowners with homes nearer than a 150 feet setback as referenced in Flat Run Solar's Response to Consultant's First Request for Information Item No. 2.

4. Confirm whether the three homes with less than the 150 feet proposed setback will experience higher A-weighted decibels during pile driving and provide the level.

5. Provide a copy of the study that was prepared regarding impact of the project on endangered species.

6. Provide notice and any applicable documentation regarding the sale of Flat Run Solar, LLC to Engie North America.

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Bidwell

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 _____ SEP 10 2021

cc: Parties of Record

*Flat Run Solar, LLC 400 W. Main St., Suite 503 Durham, NORTH CAROLINA 27701

*Gregory T Dutton Frost Brown Todd, LLC 400 West Market Street 32nd Floor Louisville, KENTUCKY 40202-3363