COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF ASHWOOD SOLAR I, LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 86 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY IN LYON COUNTY, KENTUCKY PURSUANT TO KRS 278.700 AND 807 KAR 5:110	)))))))	CASE NO. 2020-00280

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION TO ASHWOOD SOLAR, LLC

Ashwood Solar, LLC (Ashwood Solar), 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 25, 2021. The Siting Board directs Ashwood Solar to the March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085[1] 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

[1] 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.

Ashwood Solar shall make timely amendment to any prior response if Ashwood 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 Ashwood Solar fails or refuses to furnish all or part of the requested information, Ashwood 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 filing a paper containing personal information, Ashwood 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 the Application to Construct Merchant Electric Generating Facility, paragraph 2. State how much power is being contracted to the Kentucky Municipal Energy Association and explain what will be done with the remaining power generated by the proposed solar facility.

2. Refer to the Application, Volume 1, Section 6, Public Notice Report, regarding the publication of customer notice incorrectly having two dates for the public

information meeting (with the September 13, 2020, being the incorrect date and the September 17, 2020, being the correct date). State whether Ashwood Solar received any comments or feedback from the public regarding any confusion and inability of any members of the public being unable to attend the public meeting as a result of the customer notice.

3. Refer to the Application, Volume 1, Attachment J[2] – Economic Report. Provide a copy of the full economic report provided to RWE Renewables Americas, LLC (RWE) by Stantec.

4. Refer to the Application, Volume 1, Attachment J – Economic Report. Explain how the JEDI model compares to the IMPLAN model regarding modeling the economic effects of solar facility construction and operation.

5. Refer to the Application, Volume 1, Attachment J – Economic Report. Provide and describe the information given to Stantec by RWE.

6. Refer to the Application, Volume 1, Attachment J – Economic Report.

a. Explain whether the JEDI model was calibrated to just Lyon County, or calibrated to include a wider area such as contiguous counties or beyond.

b. If just Lyon County, explain the rationale for limiting the geographic area, since labor and material could easily come from surrounding counties.

c. Explain how the JEDI model was calibrated to Lyon County.

7. Refer to the Application, Volume 1, Attachment J – Economic Report. There are three job figures listed on page 2 of the report: 264 jobs, 150 jobs, and 90 jobs.

[2] The attachment itself is referenced as Attachment J, but elsewhere in the Application, it is referenced as Attachment I. For purposes of this data request, the Economic Report will be referenced as Attachment J.

Provide a more detailed explanation of these created jobs and how long these jobs are estimated to last.

8. Refer to the Application, Volume 1, Attachment J – Economic Report.

a. Explain the total PILOT or property tax revenue that would be generated and paid to the county.

b. Explain whether there are county level income tax revenues that would be generated by the project and collected by Lyon County or any other county.

9. Refer to the Application, Volume 1, Attachment J – Economic Report. Explain whether PILOT agreements are supportive of or create any jobs.

10. Refer to the Application, Volume 2, Site Assessment Report, Exhibit E: Preliminary Site Layout, and Volume 3, Ashwood Solar Phase I Environmental Site Assessment, page 4.5. There is an interstate natural gas transmission pipeline that crosses the project site. See the pipeline on the web by following these instructions: Go to the National Pipeline Mapping System (https://www.npms.phmsa.dot.gov/). Click on "Use Public Map Viewer" and then choose Kentucky and Lyon County. Use the identify (blue i) button to click on the pipeline to find the following information: the owner is Texas Gas Transmission, the system name is the Main Line System with four pipelines [30-1], [26-1], [26-2], [36-1], and all are active as of 3/11/2020. The general contact is Thomas Porter, DOT Compliance Specialist, (710) 569-5730, Thomas.Porter@bwpipelines.com, 9 Greenway Plaza Suite 2800, Houston, TX 77046.

a. State whether Ashwood Solar has contacted Texas Gas Transmission regarding this pipeline. Describe all contacts with this company.

b. State the width of the right of way and provide a copy of the easement for the four pipelines through the Ashwood site.

c. Exhibit E shows that the only potential point of access to part of the Ashwood site northwest of the pipelines is on Coleman Doles Road east of the pipelines. This would require an internal road to cross the pipelines. State whether the point of access will need to be revised to avoid crossing the pipeline on internal roads.

d. Provide any construction guidelines for the internal access road that will cross the pipeline. Also, state whether there is a vehicular weight or frequency limit either from Texas Gas Transmission or the U.S. Department of Transportation's Pipeline and Hazardous Materials Administration regarding building or using any gravel or internal roads that will cross the pipeline.

e. Revise the Preliminary Site Layout, if necessary, to show any changes regarding the Texas Gas Transmission pipelines that involve changes in the location of solar panels and points of access.

11. Refer to the Application, Volume 2, Site Assessment Report, Exhibit E: Preliminary Site Layout, and Volume 3, Ashwood Solar Phase I Environmental Site Assessment, page 5.3. There are two natural gas distribution service areas that cut through the site. These can be seen on a map or downloaded as a GIS layer from the Kentucky Geography Network (https://kygeoportal.ky.gov/). Both the city of Kuttawa and Atmos Energy Corporation, which are natural gas distribution utilities, appear to have pipelines that traverse the Ashwood site to the Texas Gas Transmission pipelines, which is probably their source of natural gas. The natural gas pipeline referred to in Volume 3 probably belongs to the city of Kuttawa.

a. State whether Ashwood Solar has contacted the city of Kuttawa regarding their pipeline(s). Describe all contacts with this utility.

b. Describe how the location of the city of Kuttawa's pipeline(s) affect or do not affect the location of solar panels or internal roadways.

c. State whether Ashwood Solar has contacted Atmos Energy regarding their pipeline(s). Describe all contacts with this company.

d. Describe how the location of the Atmos Energy's pipeline(s) affect or do not affect the location of solar panels or internal roadways.

e. Revise the site map, if necessary, to show any changes for the gas distribution pipelines that involve changes in the location of solar panels, points of access, or internal roads.

12. State where the entrances and exits to the construction site are expected to be located on KY-1943, KY-3169, Coleman-Doles Road, and US 641.

13. Identify the signage or traffic signals that will be present near those entrances and exits.

14. State how many worker commuter vehicles are expected to drive to the project site each day during construction both on average and during the peak.

15. Please provide an approximate percentage breakdown of where the construction workers will commute from each day, if possible.

16. State how many workers are expected to utilize ride-share to the construction site on a daily basis.

17. Identify the types of trucks and other equipment by weight class that are expected to access the site on a daily basis.

18. Please provide a breakdown of the traffic volume by truck category above both on an average day and on a peak day.

19. State the expected maximum weight of the largest vehicles (including any materials or equipment that the truck is hauling).

20. Identify an approximate breakdown by point of origin of the construction truck traffic.

21. Identify where the construction crew, supervisors, and others will park on-site.

22. Identify the type of roads that will be constructed on-site associated with the project. State whether there are there any plans for paving (or putting down gravel) for roads or whether there will be dirt roads.

23. State whether any studies been done to indicate how much dust will be created during the construction process. Please characterize the level of dust impacts expected during construction.

24. The project area is in two electric service territories: Kenergy and Kentucky Utilities Company. State how you propose to construct and operate the proposed solar utility with any electric service in each territory. Discuss any need to have the electric service territory boundaries revised by the Public Service Commission.

25. Identify the number of property owners that has executed lease agreements with Ashwood Solar for the proposed solar facility site and provide a copy of each of those lease agreements.

26. Refer to the questions propounded by BBC Consulting, which are attached as an Appendix to this information request, and provide responses to those questions.

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 FEB 09 2021

cc: Parties of Record

APPENDIX

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING IN CASE NO. 2020-00280 DATED FEB 09 2021

[TWO PAGES TO FOLLOW]

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MEMORANDUM

To: Quang Nguyen, Kentucky Public Service Commission

From: Michael Verdone and Douglas Jeavons

Re: Information requests for Ashwood Solar I, LLC regarding Site Assessment Report

Date: February 1, 2021

1. There appears to be some conflicting information in the SAR regarding the size of the property and the proposed facility. **Please help us to reconcile this information and identify the correct number of acres that would contain the proposed project.**

a. On page 1 of Section I of the SAR, it is stated that "the project will be situated on up to 1,521 acres."

b. The area of parcels listed in the Legal Site Description (Exhibit B of the SAR) add up to approximately 1,506.82 acres.

c. The Traffic Impact Study (Exhibit C of the SAR) states under the heading of "Introduction" (Page 1 of the exhibit) that "the project site is approximately 1,500 acres in size."

2. On page 1 of Section I of the SAR, it is stated that "a fence meeting National Electric Safety Code (NESC) requirements" will be used to secure the perimeter of the facility. However, Exhibit E (Preliminary Site Layout) also shows six road access points to the proposed site, but there is no description of how access through these points will be controlled. **Please describe how access from the six access points identified in Exhibit E will be controlled during construction and operations.**

3. Exhibit E (Preliminary Site Layout) shows six road access points to the proposed site, but no further description is given regarding which access points will be primarily used during construction and operations. **Please describe which access points will be the primary points of entry and exit into and out of the site during construction and operations.**

4. Section 1 of the SAR states "…at this time, it is not anticipated that the Project will need to receive external utility services during typical plant operation." [underline emphases added by BBC]. There are several qualifiers in this sentence. **Please identify if there are any reasonably foreseeable circumstances that would require utility services**

to the site, what those service requirements could be, and which utility(ies) are expected to provide the services.

5. Section 2 of Site Assessment Report notes that *"… representatives from Project have met personally on various occasions with adjoining landowners to address their concerns…about the viewsheds from their particular properties."* **Please identify which neighbors have been involved in these discussions (in reference to Exhibit E) and the nature of their concerns.**

6. While none of the previous merchant power plant siting applications in Kentucky have involved commercial solar facilities, previous applicants have typically provided a visual simulation of the proposed project from sensitive receptors or key observation points. **Please provide a simulation of the future view of the proposed facility from the nearest residences or other key observation points.**

7. The SAR notes that "Typical construction equipment is expected to be used for site preparation and infrastructure installation and may include dump trucks, pole drivers, backhoes, dozers, and excavators." (Exhibit C, Noise Assessment, page 4, pdf page 150). **Please provide an estimate of the amount of time each type of machine is expected to be in use during construction of the site.**

8. The SAR provides an estimate of the sound of the inverters "The 67.0 dBA estimate for the inverters is measured at a distance of 10 meters (Exhibit C, Noise Assessment, page 6, pdf page 152)." While it also provides an estimate of the sound from the tracking motors it does not indicate the distance from which this sound is measured. "The sound typically produced by panel tracking motors … is approximately 78 dB." (Exhibit C, Noise Assessment, page 6, pdf page 152). **Please provide this information.**

9. Exhibit C, Traffic Impact Study, notes that construction will take eight to twelve months and will produce a temporary increase in traffic from construction workers and delivery of equipment and material (Exhibit C, Traffic Impact Study, page 5, pdf page 166.) The SAR does not provide any information regarding the number of anticipated workers (average or peak) or the number of expected truck deliveries during construction. **Please provide this information.**

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