COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF HORUS KENTUCKY 1 LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 69.3 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY IN SIMPSON COUNTY, KENTUCKY PURSUANT TO KRS 278.700 AND 807 KAR 5:110	)))))))	CASE NO. 2020-00417

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION TO HORUS KENTUCKY 1 LLC

Horus Kentucky 1 LLC (Horus Kentucky 1) 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 2, 2021. The Commission directs Horus Kentucky 1 to the Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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.

Horus Kentucky 1 shall make timely amendment to any prior response if Horus Kentucky 1 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 Horus Kentucky 1 fails or refuses to furnish all or part of the requested information, Horus Kentucky 1 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, Horus Kentucky 1 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, Appendix E, page 1. Explain whether the web-based version of IMPLAN contains the same features and performs the same full analysis as the non-web based version.

2. Refer to the Application, Appendix E, page 1. Explain how often IMPLAN datasets are updated.

3. Refer to the Application, Appendix E, page 1. Explain how the 2019 data dollars were converted to 2021 dollars.

4. Refer to the Application, Appendix E, page 1. Explain how IMPLAN outputs predicted from the construction of power and communication facilities might over- or underestimate economic effects compared to IMPLAN outputs derived from the construction of a solar facility, if Kentucky data were to exist.

5. Refer to the Application, Appendix E, page 1. Provide further explanation of the characteristics and component costs of power and communication facilities in Kentucky and locally in Simpson County upon which the IMPLAN outputs are predicted.

6. Refer to the Application, Appendix E, page 2. Explain whether IMPLAN's industry-specific multipliers, and other factors, vary by region.

7. Refer to the Application, Appendix E, page 2. Explain how many workers of the 100 full-time jobs during the construction phase are expected to come from (1) Kentucky, (2) Simpson County.

8. Refer to the Application, Appendix E, page 2. Explain how many full-time workers are expected to be employed in the operation phase of the project.

9. Refer to the Application, Appendix E, page 2. Explain what proportion of the $80 million in capital cost for the construction phase are expected to be spent on equipment and services in (1) Kentucky, (2) Simpson County.

10. Refer to the Application, Appendix E, page 2. Of the proportion spent on labor in the construction phase, explain how salary data was estimated/obtained for the 100 full-time positions.

11. Refer to the Application, Appendix E, page 2. Explain the region affected by the estimated growth percentages given in the chart at the bottom of page 2 of the analysis.

12. Refer to the Application, Appendix E, page 2. Explain whether any of the estimated sector growth is expected to remain or decline after the projected has been completed.

13. Refer to the Application, Appendix E, pages 2–3. Provide a separate discussion of the employment, labor income, value added, and output effects of the construction phase and the operations phase of the project. Include in the discussion the separate effects upon Simpson County and the State of Kentucky.

14. Refer to the Application, Appendix E, pages 1–3. The table on page 2 and the chart on page 3 lists the direct impacts of the construction phase of the project with $80 million attributed to Display Code 52. The indirect and induced impacts of the project are found in all other industrial categories for combined impacts of an additional $17,741,854.49.

a. Explain what portion of the 100 full-time equivalent (FTE) labor is expected to come from Simpson County and from the rest of Kentucky.

b. Explain what portion of the 55.24 indirect and 71.94 induced FTE labor is expected to come from Simpson County and from the rest of Kentucky.

c. Explain the direct, indirect and induced impacts of the project during the operational phase of the project.

d. Explain the meaning of “value Added” impacts.

e. Explain whether the Impacts are on a gross or net basis, taking into account the economic value of the land and labor that is currently being employed on the project footprint. Refer to the Application, Appendix E, page 3. Provide the raw data for the employment impact chart at the top of page 3.

15. Refer to the Application, Appendix E, page 3. Explain the region affected by the employment impact given in the chart at the top of page 3 of the analysis.

16. Refer to the Application, Appendix E, page 3. Explain whether any of the jobs created from indirect and induced impacts are expected to remain after the construction has been completed.

17. Refer to the Application, Appendix E, page 3. For the table IMPLAN Tax Results – Simpson County:

a. Explain the difference between and meaning of each of the columns.

b. Explain whether property, sales, and income taxes and any other types of taxes are modeled and the individual tax effects of each type of tax. In addition, provide this breakout between the construction and operation project phases.

c. Using the response to part b. above, provide a similar table listing the tax effects for the State of Kentucky.

d. Explain whether the tax results for Simpson County are also using 2019 tax rate data, and whether any changes to Kentucky or Simpson County tax rates have occurred since then.

18. Refer to the Application, Appendix E in general. If not already addressed, explain any other assumptions that were made in order to perform this analysis.

19. Refer to the Application, Appendix E in general. Explain whether any economic impact analysis was performed for Kentucky and/or Simpson County for the operation phase of the project. Provide this analysis.

20. Refer to the Application, Exhibit H, Site Assessment Report, page 3.

a. Provide a description of any construction method that will suppress the noise generated during the pile driving process that Horus Kentucky 1 plans to employ and the associated reduction in noise that each method produces.

b. Provide Horus Kentucky 1's planned level of construction using methods that suppress noise during the pile driving process.

c. Provide the estimated additional cost the use of noise suppression methods Horus Kentucky 1 will incur.

d. Provide a description of any additional construction noise mitigation Horus Kentucky 1 considered implementing for the project, include the reason why Horus Kentucky 1 chose not to implement the additional noise mitigation.

21. a. Provide a list of specialty pile drivers that will be used during construction, include the make and model of the equipment Horus Kentucky 1 will use.

b. Provide the number of pile drivers that will be in use at the same time.

22. a. Provide a table containing all noise receptors within 1,000 feet of the project area. Include in the table the type of the noise receptor, the receptors distance to the nearest solar panel, and the receptors distance to the nearest inverter.

b. Provide a map of the project area corresponding to the table, clearly labeling the location of each of the noise receptors, solar panel, and inverter.

23. Provide a full Noise and Traffic Study that includes both historical and projected data for the proposed project to include the construction phase and the operational phased.

24. Refer to Appendix E (Economic Impact Analysis) and Appendix H (Noise and Traffic Assessments included in the Site Assessment Report), which both state a

construction period of 12 to 18 months. Confirm that 12 to 18 months is the most accurate and up-to-date assumption for the construction period.

a. Provide a detailed description of construction activities, including a construction timeline and schedule.

b. Explain whether construction activities will occur sequentially across the entire Project site, or whether different activities will take place at different times in different areas.

c. Explain when the peak activity period will occur and how long the peak period will last.

d. Various places throughout the Application note that 100 construction workers will be required to construct the Project.

(1) Confirm that the 100 workers is the average number of workers on-site at any one time.

(2) Provide the number of construction workers on-site during the peak period.

e. Confirm that construction activity would occur Monday through Friday, 7 a.m. to 7 p.m.

f. Discuss how often construction activities would occur after 6 p.m.

g. Describe the type of construction activities that might occur after 6 p.m.

h. Refer to Exhibit H (Site Assessment Report). Explain the statement that "some construction activities could also occur on weekends as necessary," including an explanation of how often construction activity would occur on weekends; whether

construction activity would occur on both Saturdays and Sundays; and if on Sundays, what the timing of those activities would be.

i. Explain whether any special construction activities or personnel will be required to connect the Project to the existing transmission line.

25. Refer to Exhibit H (Site Assessment Report) which states that "the perimeter of the property will be enclosed by a security fence."

a. Provide a detailed description of the security fence, including height, material, transparency

b. State whether the security fence will meet National Electric Safety Code requirements

c. Confirm that the security fencing will be located along the Project boundary line (as opposed to along the Project footprint).

d. State whether additional security fencing will be placed around the Substation.

26. Refer to Exhibit H, which states that "access to the Project will be controlled through secure access points." State whether all site entrances will be gated and locked when workers are not on-site.

a. Other than fencing, explain any other security measures in place during construction.

b. Other than fencing, explain any other security measures in place during operations.

c. Explain how Horus Kentucky 1 staff will coordinate security with local law enforcement agencies.

27. Refer to Appendix F (Site Plan Layout Map).

a. Confirm that there will be two site entrances used for construction access.

b. Identify and describe the locations of all site entrances.

c. Explain whether the construction entrances will also be used to access the site during Project operations.

d. Identify and escribe the location of the cemetery, as it is not clear on the map.

e. Explain the several tan colored shapes generally located along the Project boundary.

f. Explain the high, medium, and low risk avoidance areas, including what they are avoiding, the criteria for determining the levels of risk, and how those areas were identified and defined.

g. Explain the Excluded Zones listed in map legend, including what those zones are and their locations, which are unclear on the map.

h. Identify and describe the location of the Substation, which is not clear on the map.

i. Confirm that the high-voltage line on the map is the Tennessee Valley Authority's (TVA) L5402-161-kilovolt (kV) transmission line, which will serve the facility and carry electricity generated by the Project.

j. Provide a revised map or maps that clearly identify the following:

(1) Surrounding road names;

(2) Locations of staging areas;

(3) Locations of proposed vegetative buffers; and

(4) Location of the substation.

28. Provide the following information regarding Staging Areas and Access:

a. Provide the number of construction staging areas/laydown areas to be developed onsite within the Project boundary.

b. Identify and describe the location(s) of the construction staging area(s).

c. Provide the acreage of each construction staging area.

d. Clarify whether the construction staging areas will be gravel.

e. Clarify whether worker parking also be located within the staging area(s).

f. Clarify whether the staging area(s) have not their own separate or additional security fencing.

g. Explain whether the staging area(s) be removed and returned to their original conditions or whether they will be covered with solar panels once construction is complete.

29. Confirm that no permanent building(s) will be located on-site for Project operations.

30. Provide the number of miles of internal roadways that be developed within the Project site and clarify whether all internal roadways will be gravel.

31. Provide a detailed table showing the number of residential structures located within 300-foot intervals from the Project fence line, i.e., from 0–300 feet, from 300–600 feet, up to 2,100–2,400 feet.

a. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e. church, school, commercial, barn, etc.), located within 300-foot intervals from the Project fence line, from 0–300 feet up to 2,100–2,400 feet.

b. Provide a map indicating residences within 300 feet of the Project fence line and a table stating the distances (within ten feet) of those residences to the fence line.

c. Provide a detailed table showing the number of residential structures located within 300-foot intervals from the nearest solar panels, from 0–300 feet up to 2,100–2,400 feet.

d. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.), located within 300-foot intervals from the nearest solar panels, from 0–300 feet up to 2,100–2,400 feet.

e. Provide a map indicating residences within 300 feet of the nearest solar panels and a table stating the exact distances of those residences to the nearest panels.

32. Clarify whether any existing structures on the Project site will be demolished or removed in order to accommodate the Project.

33. Describe any water or wastewater services that will be required during construction or operations and who will provide those services.

34. Refer to Appendix G (Legal Boundaries). Provide a map showing each parcel included in the provided legal boundary descriptions, indicating acreage and ownership of each parcel.

35. Provide a copy of the Simpson County Planning and Zoning requirements applicable to the Horus Kentucky 1 Project. Highlight the appropriate sections regarding applicable setback requirements.

36. Refer to Section 4.0 of the Application. Explain whether the local setback requirements refer to the Project boundary or to the Project footprint (Project infrastructure, including solar panels).

a. Confirm whether the Franklin-Simpson County Zoning Board is responsible for reviewing Project maps and documents to ensure that the applicable setback requirements are met.

b. Confirm whether the review of the Project, with regard to the County's setback requirements for solar facilities, will be completed as part of the County's Conditional Use Permit process.

37. Provide the current property values of each property adjacent to the Project site.

a. Provide property values of raw land or residential structure values per constructed square foot of developed property in Simpson County in the vicinity of the Project site.

b. Confirm that the Applicant has lease agreements with two separate parties and that those two agreements encompass the entire Project site.

c. Explain whether any other agreements exist with property owners in the area, including right-of way agreements, utility access agreements or other types of land use agreements.

38. Refer to Appendix I (Property Value Impact Study, or Kirkland Report):

a. The Kirkland Report states that the Project will be constructed on a 547.6 acre portion of a 592.06 acre assemblage. Information in other areas of the Application state a total Project site acreage of about 550 acres, with about 500 acres covered in panels. Provide the correct total acreage included in the Project site.

b. Page 7 of the Kirkland report provides information on parcels adjacent to the Project area. Confirm that the data is consistent with that of the Simpson County PVA.

c. Confirm that, for those parcels where the distance between the home and the nearest solar panel is stated as N/A, the N/A designation is due to the lack of a residential structure on that property.

d. One adjacent property is identified as Commercial. Explain the commercial activities that occur on that property.

e. Describe the influence of vegetative buffers on minimizing impacts to property values related to view of solar facilities.

39. Refer to Appendix F (Site Plan Layout Map), which identifies a cemetery located within the Project boundary.

a. Describe the cemetery, in terms of size, age, and level of use.

b. Explain who owns and is responsible for maintenance of the cemetery.

c. Describe any conversations or outreach to the owner of the cemetery land and the nature and resolution of those discussions.

d. Explain whether the cemetery will be accessible during construction and during Project operations.

40. Provide a complete copy of any traffic studies for the Horus Kentucky 1 Project, including (1) baseline traffic data at multiple locations on surrounding roads; (2) construction traffic volumes (commuting workers and trucks) on affected roads, on average and in the peak period; (3) detailed information on construction truck trips, by truck class size; (4) additional information about heavy load trips; (5) bridges utilized by construction traffic, if applicable; (6) times of day that peak construction traffic activity may occur; (7) traffic management or mitigation measures; and (8) operational traffic, including worker vehicle trips and truck trips.

41. Provide the following information for the construction phase of the Project:

a. The number of worker commuter vehicles traveling to the Project site on an average day;

b. The number of worker commuter vehicles traveling to the Project site on a peak day;

c. The number of workers per vehicle traveling to the Project site;

d. The roads worker commuter vehicles will use to access the Project site;

e. The number or percentage of worker commuter vehicles assumed to use each road;

f. The number of trucks traveling to the Project site on an average day, by Class size; and

g. The number of trucks traveling to the Project site on a peak day, by Class size.

h. Specify which roads the trucks will use to access the Project site.

i. Provide an estimate of the number or percentage of trucks assumed to use each road.

j. Explain how construction traffic, including commuting workers and trucks of all sizes, will be managed on roads used for Project activities.

k. Refer to Exhibit H (Site Assessment Report). Provide a map showing the locations of the two traffic stations listed in the Traffic Assessment.

l. Provide additional data on existing traffic volumes on local roads from any sources, including Simpson County.

m. Explain whether any residents will experience issues accessing their residences during or after construction.

n. Explain whether any temporary housing will be developed on-site.

o. Explain whether Horus Kentucky 1 has met with the Simpson County Road Department or the Kentucky Transportation Cabinet about potential traffic management issues. Describe the scope and resolution of those discussions.

42. Provide data regarding the weight and frequency of each vehicle category that will be traveling to the site during operations.

43. Explain how fugitive dust will be managed during the construction period. If applicable, describe odor impacts from diesel fumes or other sources from construction vehicles that may be noticeable to nearby residents.

44. Indicate whether the Project site will be irrigated to promote vegetation growth and reduce potential erosion.

45. Provide a complete copy of any noise study completed for the Project, including (1) data on ambient noise levels in the area of the Project; (2) descriptions of

the types of construction equipment used for the Project; (3) descriptions of various construction activities and timelines for those activities; (4) data on sound levels for construction equipment, by distance from the source; (5) descriptions of noise impacts on local noise receptors near the Project during construction; (6) noise mitigation measures to be implemented during construction; (7) data on noise levels for specific solar equipment (inverters, motors, transformer) during operations; (8) descriptions of noise impacts on local noise receptors near the Project during operations; and (9) noise mitigation measures to be implemented during operations, if any.

46. Provide the following for the construction phase of the Project:

a. The number of noise receptors, such as homes, within 300 feet of construction noise greater than 55 dBA for any period of time.

b. For each noise receptor, provide the maximum construction noise level experienced and the expected duration of that noise.

c. The number of noise receptors, such as homes, between 300 feet and 600 feet from construction noise greater than 55 dBA for any period of time.

d. For each noise receptor, provide the maximum construction noise level experienced and the expected duration of that noise.

e. Provide the average and peak noise levels of construction activities occurring after 6 p.m. in those areas where active construction would occur at that time.

f. State the duration, in days or weeks, of pile driving activity.

g. State the time of day in which pile driving activities would occur.

h. Explain the process and noise levels associated with the installation of security fencing.

i. Describe any specific mitigation activities that will be undertaken to reduce noise impacts.

47. Provide the following information for the operational phase of the Project:

a. Confirm that ambient noise levels in the Project area are generally 40–45 dBA during the operational phase.

b. Provide a table showing the number of residential structures located within 300-foot intervals from the nearest inverter, from 0–300 feet up to 2,100–2,400 feet.

c. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.), located within 300-foot intervals from the nearest inverter, from 0–300 feet up to 2,100–2,400 feet.

d. Provide a detailed table showing the number of residential structures located within 300-foot intervals from the substation, from 0–300 feet up to 2,100–2,400 feet.

e. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.), located within 300-foot intervals from the substation, from 0–300 feet up to 2,100–2,400 feet.

f. State the number of tracking motors that will be installed on-site.

g. Provide data about the cumulative noise effect of the inverters and tracking motors during daytime hours for noise receptors within 2,400 feet of an inverter/motor.

h. Provide the noise level generated by the inverters and motors at night.

i. For each noise receptor within 2,400 feet of the substation, provide data about the cumulative noise effects of the inverters, motors, and transformer.

48. Explain whether any existing vegetation (trees, bushes, etc.) will be removed from the Project site to accommodate construction activities or to make room for solar infrastructure. This would include existing vegetation located along the Project boundary line or within the overall Project site.

49. Provide any visual impact assessments or other visual impact studies completed for the Project, including (1) description of the land uses in the area of the Project and existing vegetation and topography of the area; (2) description of the methods and process used to evaluate visual impacts and determine the need for vegetative buffers; (3) identification of specific locations proposed for buffering; (4) physical descriptions of the vegetative buffers; (5) images of the Project site with solar equipment, fencing and buffers superimposed on different locations; and (6) evaluation of glare potential.

50. Provide the total number of solar panels to be located on the Project site.

a. Refer to Appendix F (Site Plan Layout Map). Explain whether two different types or two different sizes of panels will be used within the Project.

b. If two different types or sizes of panels will be used, explain what impact that has to the Project, especially in terms of visual differences, including height.

c. Provide the maximum height of the solar panels.

51. Refer to Exhibit H (Site Assessment Report). The Mitigation Measures & Conditions section states that "the Project could be visible from a roadway or neighboring

residence. In these cases, Horus [Kentucky 1] renewables will add a vegetative buffer in order to mitigate potential view shed impacts."

a. Provide a map of the locations for the proposed vegetative buffers.

(1) Explain how those specific locations were chosen, including the specific criteria used to evaluate the need for a buffer in certain locations.

(2) Explain whether any existing vegetation surrounds the Project site, which would limit the view of the Project from surrounding residences or roads.

(3) Explain whether the proposed vegetative buffers will be located outside the Project fencing.

(4) Describe the types of trees, plants or other vegetation that will be used for the buffer.

(5) Describe the height of the vegetation at the time of planting.

(6) Describe the maximum height of the buffer maturity.

(7) Explain how long it will take for the buffer to reach mature height.

(8) Describe any other forms of visual barrier to be implemented between the time of vegetation planting and the time that vegetation will reach mature height.

(9) Describe the plan for maintaining the vegetative buffer and replacing dead vegetation throughout the operational period.

(10) Provide any computer-generated images portraying the solar panels, security fencing, and newly planted vegetation, if available.

(11) Provide any computer-generated images portraying the solar panels, security fencing, and mature vegetation, if available.

b. Explain how the cemetery located within the Project boundary will be protected from the view of construction activities or solar panels and other infrastructure.

c. State whether any acreage of native pollinator species will be planted on-site.

d. Provide any glare studies completed to evaluate the potential for any types of glare at any locations surrounding the Project site.

e. State whether the Project will use anti-glare panels.

f. Explain whether there will be any glare affecting drivers on roads surrounding the Project site, including I-65, Tyree Chapel Road, Flat Rock Peden Mill Road, Geddes Road, or other roads, as the panels rotate over the course of the day during different times of the year.

g. Explain whether any residences surrounding the Project site will experience glare as the panels rotate over the course of the day during different times of the year.

h. Explain whether Horus Kentucky 1 will ensure that there are no glare impacts resulting from Project operations.

i. Explain how glare will be mitigated, if it occurs.

52. Provide the following information regarding compliance with public awareness and involvement:

a. Any additional documents, maps, graphics, or materials that have been presented to the community or other groups as part of outreach efforts, other than the information previously provided in Appendix B.

b. Describe the specific issues or concerns brought up by the public or others as the result of public meetings or through other avenues.

c. Provide any available transcripts of the public meetings and any written or oral comments offered by the public or government agencies.

d. Indicate how many people attended each public event.

e. Describe any issues or concerns brought up by the public or others regarding potential impacts to the cemetery or the Tyree Chapel Church of Christ.

f. Describe any conversations or outreach to adjacent homeowners, especially those within 300 feet of Project solar panels, and the nature or resolutions of those discussions.

g. Explain any plans to coordinate with local landowners or others in case of complaints or other issues that arise during the course of construction or operations.

53. Refer to Appendix H (Site Assessment Report), which states that the Company will seek a Conditional Use Permit from the Franklin-Simpson County Zoning Board.

a. Explain the status of that permitting process.

b. Explain the areas of focus or concern associated with that permit.

c. Describe the issues or concerns brought up by the Commissioners or the public as part of that permitting process.

d. Provide all materials submitted to the Commission and all public materials (documents or decisions) associated with this permitting process.

54. Provide a list and description of all other permits Horus Kentucky 1 will need to obtain from other agencies (Commonwealth of Kentucky, federal agencies, and local government) before construction or operation and copies of any submittals to those agencies, other than any already provided, that address any of the specific topics addressed in this inquiry.

55. Refer generally to Appendix E (Economic Impact Analysis).

a. Provide an estimate of the amount of money likely to be spent on purchases of materials, supplies, equipment or other items in Simpson County in support of facility construction.

b. Provide an estimate of the amount of money likely to be spent on purchases of materials, supplies, equipment, or other items outside of Simpson County, but within the Commonwealth of Kentucky in support of facility construction.

c. Provide an estimate of the amount of sales or use tax revenue generated by the purchase of construction materials within Kentucky.

d. Provide the approximate percentage of the estimated 100 FTE construction workers that will be hired from within Simpson County (local residents).

e. Explain the estimate of $29.7 million in construction labor income for 100 FTEs, which amounts to over $297,000 per FTE over the 12 to 18 month construction period. If necessary, revise the estimate of labor income and the associated estimate of payroll taxes.

f. Explain the IMPLAN analysis table that states that $80 million of output would be created in Simpson County in relation to the earlier statement that capital construction costs would be $80 million. For solar projects in general, a large portion of capital costs occur outside of the local area (i.e., purchase of the solar modules). Revise this analysis as necessary.

g. Provide an estimate of the number of permanent positions or FTEs required for on-going Project operations.

h. Provide the expected annual salary levels for those positions.

i. Provide an estimate of the amount of money expected to be spent on the purchase of material/supplies in the local area (Simpson County) each year during the operational phase.

j. Describe the types of items to be purchased locally for Project operations.

k. Explain whether the Horus Kentucky 1 is planning to seek an Industrial Revenue Bond and PILOT agreement with Simpson County. If so, provide the status of that process.

l. Provide a detailed table showing property tax revenues generated by the Project each year for the life of the Project.

m. Provide a detailed table indicating the specific taxing entities that will receive those revenues and how much will be received by each entity over the life of the Project.

56. Please confirm or correct our understanding that the expected life of the Project is approximately 30+ years.

57. Provide a copy of the decommissioning plan, if available.

a. Provide a detailed description of decommissioning activities, including an explanation of what will be done with facilities/structures on-site.

b. Explain whether all facilities above and below ground will be removed from the Project site.

c. Provide a detailed description of land restoration activities, once Project components have been removed from the site.

d. Confirm that the Project site will be returned to pre-existing conditions.

e. Explain the commitments regarding land restoration included in the landowner lease agreements. Provide copies of those agreements.

f. Explain whether the Horus Kentucky 1 will agree to a decommissioning bond, specifically naming Simpson County as the secondary beneficiary.

Linda C. Bridwell

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
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DATED AUG 19 2021

cc: Parties of Record

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