

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF BLUEBIRD)	
SOLAR LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY 100)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR)	2021-00141
GENERATING FACILITY IN HARRISON)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

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

Bluebird Solar LLC (Bluebird 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 April 8, 2022. The Siting Board directs Bluebird 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 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

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).

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.

Bluebird Solar shall make timely amendment to any prior response if Bluebird 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 Bluebird Solar fails or refuses to furnish all or part of the requested information, Bluebird 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, Bluebird 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, Attachment J, page 1. Provide an estimate of the output value of the 1,343 acres currently and an estimate of the increase in output value as a result of the project.

2. Refer to the Application, Attachment J, page 2.

a. Provide detailed support for the estimated on-site labor costs amounting to \$15.1 million. Include in the response a breakdown of hours required by occupation.

b. Explain whether Bluebird Solar provided data that showed or allowed the calculation of construction labor costs, as opposed to costs having to be estimated.

c. Explain whether the estimated \$15.1 million in labor costs include fringe benefits and other indirect labor costs. If not, explain whether Bluebird Solar is required to pay these costs to its workforce during the construction period.

3. Refer to the Application, Attachment J, page 3.

a. Of the 69 new estimated jobs created as a result of the direct project expenditures, explain, if possible, what occupational job categories will experience the employment increase.

b. Provide support for the increase of \$3.12 million (\$18.22 million total minus \$15.10 million construction costs) in new payroll for Harrison County.

4. Refer to the Application, Attachment J, page 5. Explain whether the occupational wage rates for the seven regional county study area are the same as those used in the Harrison County study area.

5. Refer to the Application, Attachment J, page 3. Provide an estimate of the income tax revenue generated by the two or three jobs created during the operational phase of the project.

6. Refer to the Application, Attachment J, pages 5–6.

a. Provide an estimate of the current income tax revenue generated by the 1,343 acres.

b. Explain whether the current income generated by the 1,343 acres for the property owners is subject to the Harrison County occupational tax. If so, provide an estimate of the current amount.

c. Provide an estimate of the increase income tax revenue as a result of the project in both Harrison and in the seven regional counties.

d. Explain whether the surrounding counties in the seven regional county area levy an occupational tax. If so, provide an estimate of the occupational tax revenue generated for both the construction and operation phase.

7. Refer to the Application, Attachment J, page 6. Explain how the industrial revenue bond and payment in lieu of taxes process works and why this is advantageous to Bluebird Solar.

8. Provide the number of miles between the Bluebird Solar Project and the Blue Moon Energy Solar Project (Blue Moon), Case No. 2021-00414,² currently pending before the Siting Board.

9. Explain any overlaps in the projected construction schedules of this project and Blue Moon.

10. Describe the potential for cumulative effects on traffic and roadways from construction activities of the two projects, and any steps planned to minimize this.

11. Describe the potential for cumulative noise effects resulting from the construction activities of the two projects, and any steps planned to minimize this.

² Case No. 2021-00414, Electronic Application of Blue Moon Energy LLC for a Certificate of Construction for an Approximately 70 Megawatt Merchant Electric Solar Generating Facility and Nonregulated Electric Transmission Line in Harrison County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110 (K.S.B. Feb. 8, 2022).

12. Describe the potential for cumulative effects on property values and land uses from the operation of the two projects.

13. Describe what steps have been taken, or will be taken, to communicate with the applicants in Blue Moon to coordinate to avoid potential detrimental effects referenced in Items 9–12 above.

14. Submit a copy of the leases or purchase agreements, including options, separate agreements or deeds, that Bluebird Solar has entered in connection with the footprint for the proposed solar facility, including the agreements for each of the parcels of the project.

15. Detail any contracts by which Bluebird Solar has paid, has negotiated to pay, has contracted to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near the project. Include the terms of that agreement and which properties are involved in terms of distance to the project boundaries.

16. Detail the status of any applications for zoning changes or conditional use permits that are required for this project.

17. Detail the status of any litigation in state or federal court, or before an administrative agency other than the Siting Board involving this project.

18. Reference Appendices-B of Attachment H and I of the Application. Provide an Electrical One-Line Diagram of the project.

19. Reference Appendix B of the Site Assessment Report (SAR). Explain whether the transmission line connecting the switching station and the existing utility substation is a part of the project.

20. Provide information on the specifications, model number, and cutsheets of the photovoltaic (PV) cell/solar panels to be used.
21. Provide information on where the PV cells/solar panels and the plant equipment are manufactured.
22. Provide information on the temporary power required for construction of the plant.
23. Identify whether storage is being used and provide safety data sheets/cutsheets for any proposed energy storage system.
24. Provide information on the environmental impact the of the energy storage system.
25. If batteries are to be used for energy storage, provide the life expectancy of the batteries.
26. Explain whether the batteries will be recycled. If not, explain how the batteries will be disposed.
27. Provide information on any fiber optic or communication network installed as a part of the project and any excavation that may be required for the installation.
28. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, and including the length of each construction phase.
29. Provide information about the existing and proposed utilities for the plant and for service to the proposed facility buildings.
30. Provide Department of Energy transformer compliance for Substation Transformers.

31. Refer to the Application, Attachment A. The map shows the project in three distinct areas separated by land that is not a part of the project.

a. Provide information on how the three areas will be interconnected.

b. Explain whether easements have been sought or granted for the interconnection of the three areas.

c. Provide information on regulations for this interconnection.

d. Provide information on how the interconnection will impact the surrounding areas.

32. Provide information as to whether there are any churches located within two miles of the project's boundary.

33. Refer to the Application, Attachment C, page 63. Provide the guidelines used for the Running Buffalo Clover survey.

34. Refer to the Application, Attachment C, page 50. Provide the guidelines used for the Short's Goldenrod survey.

35. Refer to the Application, Attachment C, page 3. Provide any additional surveys to be done to identify endangered bats in the project vicinity.

36. Refer to the SAR, Appendix D, page 9. Provide the information on the selection of noise sensitive receptors.

37. Refer to the SAR, page 6. Provide information used for the analysis on fugitive dust for the construction and operation phases of the project.

38. Provide information on the impacts of the project on ground water or surface water.

39. Refer to the SAR, page 7. Provide the stormwater management plan that is referenced.

40. Refer to the SAR, Appendix A.

a. Provide whether the Appraiser visited the site in person.

b. Provide information on the legal proceedings referenced in the study.

c. Provide information on the potential residential development surrounding the project.

d. Provide information for potential change in the best use of properties around the project.

e. Provide information on platted residential lots around the project.

41. Refer to the SAR, Section 4, pages 5–6, and Appendix D, generally. Section 4, pages 5–6, appear to be the only places where noise generated during the construction phase of the project is discussed.

a. Provide a list and discussion of equipment that during the construction phase generate noise and the anticipated noise levels generated. The list should include relevant items such as air compressors, earth moving equipment, pile driving equipment and activity, trucks, pumps, pneumatic tools, spike drivers, tie cutters, tie handlers, tie inserters, and welders or torches.

b. Refer to Appendix D, Table 3, page 11

(1) Explain what assumptions were made for the “worst case scenario.”

(2) Provide a table similar to Table 3 that lists the anticipated noise levels generated by the equipment or construction related activity identified in Item

41a. above at each of the noise receptors R1 through R26 locations. Include in the table the distance between each noise receptor and the equipment or activity causing the noise in the “worst case scenario.”

42. Refer to the SAR, Appendix D, page 10. Provide the basis for the assumption that the sound typically produced by each panel tracking motor is 61 dBA at 5 feet or a sound power level of 73 dBA.

43. Refer to the SAR, Appendix D, page 10. Provide the basis for the assumption that the sound typically produced by each inverter is 65 dBA at 5 feet or a sound power level of 77 dBA.

44. Refer to the SAR, Appendix D, page 10. Provide the basis for the assumption that the sound typically produced by each small scale transformer is 58 dBA at 5 feet or a sound power level of 70 dBA.

45. Refer to the SAR, Appendix D, page 10. Provide the basis for the assumption that the sound typically produced by a large transformer at the Substation has a noise level of 71 dBA at 5 feet or a total sound power level of 86 dBA.

46. Refer to the SAR, Appendix D, Table 3, page 11. Confirm that all relevant sound receptors including residences, schools, churches, cemeteries within 500 feet of any sound generating equipment is captured in Table 3. If not, provide an update to the table to show all relevant noise receptors within 500 feet of noise generating equipment during both construction and operation of the facility.



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 MAR 24 2022

cc: Parties of Record

Case No. 2021-00141

Daryl Northcutt
Chairman- Harrison County Planning Commission
111S Main St, Ste 202
Cynthiana, KENTUCKY 41031

*Gregory Coulson
Resident Representative
113 South Walnut Street
Cynthiana, KENTUCKY 41031

*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