

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)	CASE NO.
100-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 SECOND 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 May 6, 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, Site Assessment Report (SAR), Appendix D, Operation Noise Analysis Report on pages 1–2, Table 1 on page 4, Table 2 on page 5, Figure 2 on page 6, Table 3 on page 11, and Figure 5 on page 13. Pages one and two define noise measures. Each of the Tables and Figures list noise measures, not all of which appear to be consistent. Explain and provide updates that contain or indicate consistent noise measures.

2. Refer to Bluebird Solar's response to the Siting Board's First Request for Information (Siting Board's First Request), Item 14a. The Construction Noise Analysis Report was not included with either the Application or the response. Provide a copy of the report.

3. Refer to Bluebird Solar's response to the Siting Board's First Request, Item 14b. The Bluebird Operation Noise Analysis Report included as an attachment is dated July 2021. A similar report was included with the Application as included with the Application in the SAR, Appendix D, Noise Analysis Report dated April 2021. These reports contain different data and explanations beginning on page 11. In addition, neither report contains a Table 6, referenced in the response. The last table included in the report is Table 3 on page 11. Provide a complete copy of the report and explain which report should be relied upon by the Siting Board.

4. Bluebird Solar is in an area classified as intense karst by the Kentucky Geological Survey. Provide any geologic studies that have been done. If a geologic study has not been done, explain how it will be determined if any karst formations will affect the construction of the solar facility.

5. Harrison County Water Association provides water services in the project area. The Water Resource Information System (<https://wris.ky.gov>) shows a proposed 4-inch water line extension on the project's eastern boundary. Explain how the construction and operation of the project affects this proposed water line extension.

6. Provide information describing how the interconnection of the three project areas will not interfere with existing utilities: particularly water, gas, or communications.

7. Refer to Bluebird Solar's response to the Siting Board's First Request. Resubmit the following maps with a higher resolution: Exhibit 6 to the Real Estate Swap Agreement provided in response to Item 14 (ALTA/NSPS Land Title Survey), and Figure 1 of the Operation Noise Analysis Report provided in response to Item 41.

8. Refer to Bluebird Solar's response to Item 41 of Staff's First Request. The Operation Noise Analysis Report Figure 1 shows archaeological sites. Describe these archaeological sites within the project boundaries and provide any study and photographs of those sites.

9. Refer to Bluebird Solar's response to the Siting Board's First Request Item 14. Exhibit 12 in the Real Estate Swap Agreement references the Jacksonville Cemetery. Explain the location of the Jacksonville Cemetery within the project boundaries. Describe the cemetery including the number of burials, the date of the most recent burial, and photographs.

10. Provide any information as to whether there are any additional cemeteries within two miles of the project boundaries. Provide descriptions of the cemeteries including the number of burials, the date of the most recent burial, and photographs.

11. Provide an ALTA Survey for the project. If it has not been completed, provide the estimated date for completion.

12. Refer to the Application, Exhibit J, Economic Impact Report. Provide the amount and source of any excise taxes (sales or use taxes) to be paid for goods and services in Kentucky.

13. Explain whether the underground construction to interconnect the sections of the project will cause a short-term closure of Allen Pike or Russell Cave Road. If so, confirm compliance with any permitting requirements for road closure.



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 APR 20 2022

cc: Parties of Record

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