

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF TELESTO	)	
ENERGY PROJECT LLC FOR CERTIFICATE OF	)	
CONSTRUCTION FOR AN APPROXIMATELY 110	)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR	)	2022-00096
GENERATING FACILITY IN HARDIN COUNTY,	)	
KENTUCKY	)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION  
TO TELESTO ENERGY PROJECT LLC

Telesto Energy Project LLC (Telesto), 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 26, 2022. The Siting Board directs Telesto to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

Telesto shall make timely amendment to any prior response if Telesto 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 Telesto fails or refuses to furnish all or part of the requested information, Telesto 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, Telesto 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 Telesto's response to Siting Board Staff's First Request for Information (Response to Staff's First Request), Item 32.

a. Confirm that county level data is available with which to run the JEDI model.

b. If similar projects in Ohio have estimated creation of at least 150 jobs at the county level during construction, explain why Telesto chose not to run the JEDI

model at the county level and, instead use the less accurate scaling method to estimate local economic impacts.

2. Refer to the Application, Exhibit B.2.e, page 2, the information sheet provided to local residents, and Exhibit M, page 5. Also, refer to the Response to Staff's First Request, Item 33 b.

a. Exhibit B.2.e states, "150-200 direct jobs, during the approximately 10–12-month construction period, with the majority local workers." Telesto's application contains an estimated 335.9 direct construction jobs coming from Kentucky, but only 8.4 direct construction jobs as coming from Hardin County. Explain differing direct employment estimates.

b. Explain whether Telesto informed attendees at any public or private meetings that it estimated that only 8.4 direct construction jobs would come from Hardin County.

c. Assuming the statement in the public information sheet of a majority of the 150-200 jobs will be hired locally is correct, this means the indirect and induced economic impacts will also be much greater than Telesto's official estimates. Provide updated economic impact analysis supporting its public statement that a majority of the direct construction jobs will be hired locally.

d. From previous project development experience, it would be reasonable to assume that the necessary types construction skills, the total number of workers hired, and the number hired locally would be known with a reasonable degree of certainty. Explain both how the model obtained a result of 335.9 direct construction jobs

for Kentucky and the origin of the 150-200 jobs advertised in public information documents.

3. Refer to the Response to Staff's First Request, Item 42.

a. If pile driving activity produces sound levels that are greater than Environmental Protection Agency (EPA) daytime standards at the sensitive noise receptor, explain why pile driving intermittency is relevant.

b. Explain whether Telesto intends to use multiple pile drivers in close proximity such that the sound levels produced would be magnified beyond what would be produced by a single pile driver and, if so, explain what those sound levels would be.

c. In instances where pile driving activity will cause significant noise pollution, explain what additional mitigation measures will be used.

d. In instances where pile driving or other construction noise, is greater than EPA daytime standards at sensitive noise receptor locations, confirm that the only effective sound mitigation measures Telesto proposes are "significant buffers and vegetation zones."

4. Refer to the Response to Staff's First Request, Item 43. Confirm that during the construction period, no sensitive noise receptor within 1,500 feet of construction noise producing activity will experience construction noise levels in excess of 55 decibels. If it cannot be confirmed, explain what measures Telesto will employ to mitigate the noise down to the level of at least 55 decibels.

5. Refer to the Response to Staff's First Request, Item 28. Provide an update on whether any discussions have occurred with the city of Elizabethtown and the Energy

and Environment Cabinet's Division of Oil and Gas regarding the gas storage field. If there still has not been a consultation, provide details on when that consultation will occur.

6. Refer to the Response to Staff's First Request, Item 29. Provide an update to any contact with representatives at Energy Transfer Partners regarding the crude oil pipeline within the project boundaries.

7. Refer to the Response to Staff's First Request, Items 18, 19, 20, and 21 and the 10 percent Design Layout Plan (filed August 23, 2022).

a. Provide the location where each medium voltage (MV) line goes underground within the project boundary.

b. Confirm the transmission line from the project substation to the East Kentucky Power Corporation substation will be underground.

c. Provide a copy of the lease or purchase agreement for the land the project substation will be located on.

d. Provide any right of way agreements for the nonregulated transmission line.

e. Provide an approximate date the application for the nonregulated transmission line will be filed.

8. Refer to the Response to Staff's First Request, Item 17. The Project is located within two electric service areas, Kentucky Utilities and Nolin Rural Electric Cooperative Corporation. Provide which service territory the proposed Operation & Maintenance Building is located.

9. During the Site Visit, representatives from Telesto indicated there has been a reduction in the number of site entrances. Provide a simplified map that clearly delineates the location of the revised access points and the public roads from which Telesto plans to access the project site during construction and operations. Show the name of the relevant public roads. Do not provide the anticipated locations of solar equipment within project, just the roads that will be utilized.



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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 SEP 16 2022

cc: Parties of Record

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