

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF)	
THOROUGHbred SOLAR, LLC FOR)	
CERTIFICATE OF CONSTRUCTION FOR AN)	CASE NO.
APPROXIMATELY 50 MEGAWATT MERCHANT)	2022-00115
ELECTRIC SOLAR GENERATING FACILITY IN)	
HART COUNTY, KENTUCKY PURSUANT TO)	
KRS 278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO THOROUGHbred SOLAR, LLC

Thoroughbred Solar, LLC (Thoroughbred Solar), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on March 10, 2023. The Siting Board directs Thoroughbred Solar to the 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.

Thoroughbred Solar shall make timely amendment to any prior response if Thoroughbred Solar obtains information that indicates the response was incorrect or incomplete when made or, though correct when made, is now incorrect or incomplete in any material respect.

For any request to which Thoroughbred Solar fails or refuses to furnish all or part of the requested information, Thoroughbred 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 and scanned 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, Thoroughbred Solar shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a copy of the Phase I Environmental Site Assessment.
2. Provide the affected systems studies completed by Louisville Gas & Electric and the Tennessee Valley Authority.

3. Provide information about the contact and outreach Thoroughbred Solar has had with the property owners in the three residential neighborhoods that are included in the deviation request.

4. Provide the manufacturer's specifications for noise during operations of the small pile driver that is to be used during construction of the project.

5. Provide the National Cooperative Highway Research Program sound data set that was used to calculate the noise impacts for the project.

6. Provide the occupation and salary range for each job that will be created in the operational phase of the project.

7. Refer to the Application, Exhibit 10, page 10, Tables 3 and 4. The construction and operational phases of the project will generate over \$20 million in statewide labor income. Provide an estimate of the state and local income taxes and occupational taxes that will be generated by the project in construction and operation phases.

8. Refer to the Application, Exhibit 10, page 10. The analysis was conducted at the state level.

a. Provide the local economic impacts during both the construction and operational phases of the project. In the response, include estimates of the direct, indirect and induced jobs created, value of wages and salaries, and economic output. Also, include an explanation of how the local economic impacts were calculated or derived.

b. Referring to the Application, Exhibit 6, Attachment A-1, page 6. The handout promises "hundreds of temporary construction jobs, temporary jobs induced by construction and long-term operations and maintenance jobs." Reconcile the differences

between the hundreds of jobs that will be in Hart County versus the 141 direct statewide jobs promised in Exhibit 10, page 10, Table 3.



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 FEB 27 2023

cc: Parties of Record

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