

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF MARTIN)	
COUNTY SOLAR PROJECT LLC TO TRANSFER)	CASE NO.
A CERTIFICATE OF CONSTRUCTION)	2022-00362
PURSUANT TO KRS 278.710(3) AND 807 KAR)	
5:110)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
TO MARTIN COUNTY SOLAR PROJECT LLC

Martin County Solar Project LLC (Martin County 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 February 20, 2023. The Siting Board directs Martin County 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.

Martin County Solar shall make timely amendment to any prior response if Martin County 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 Martin County Solar fails or refuses to furnish all or part of the requested information, Martin County 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 or 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, Martin County 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. Identify the company that will employ the individuals that are, or will be, responsible for ensuring compliance with the statements in the application and any conditions imposed by the Siting Board during construction and operation of the project. Include in the response whether the individuals responsible for ensuring compliance with the statements in the application are the same individuals performing the same functions as those in Martin County Solar. If not, then explain any differences.

2. Provide the current corporate structure of Savion, LLC (Savion), including its parent company.
3. Provide the corporate structure of Savion, Martin County Solar, and Martin County Solar II, if the transfer is approved.
4. Provide the reasons, and support, for the division of the project into Martin County Solar and Martin County Solar II.
5. Provide the reasons why, if approved, Martin County Solar and Martin County Solar II cannot not be developed at the same time.
6. Provide a project construction timeline with approximate in-service dates schedule for Martin County Solar and Martin County Solar II, if approved.
7. Refer to the Application, page 5. Explain the environmental compliance that is necessary for the project and the costs of that compliance.
8. Refer to the Application, page 5. Explain how splitting the project into two parts, Martin County Solar, and Martin County Solar II, will affect the Industrial Revenue Bond (IRB) and Payment in Lieu of Taxes agreement (PILOT) with Martin County Fiscal Court. Include in the response whether Martin County Solar and Martin County Solar II have notified all appropriate authorities of the intention to bifurcate the ownership and all other aspects of the project and received permission to do so.
9. Refer to the Application, page 5. Explain how splitting the project into two parts, Martin County Solar, and Martin County Solar II, will affect the financial agreement with the Kentucky Economic Development Finance Authority.
10. Provide an updated site development plan that details the changes that will occur if the transfer is permitted.



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 JAN 17 2023

cc: Parties of Record

Case No. 2022-00362

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