

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF DOGWOOD)	
CORNERS LLC FOR CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY 125)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR)	2023-00246
GENERATING FACILITY IN CHRISTIAN)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO DOGWOOD CORNERS LLC

Dogwood Corners LLC (Dogwood Corners), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 22, 2023. The Siting Board directs Dogwood Corners 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.

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

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

1. Provide an updated site map showing the location of:
 - a. Parcel boundaries.
 - b. Perimeter fencing.
 - c. Access roads.
 - d. Access points.

- e. Transmission line.
- f. Substation.
- g. Battery energy storage system (BESS).
- h. Vegetative screening.

2. Explain why a new substation location was chosen. Include in the response why the original location is no longer being utilized. Include factors led to deciding the new substation location.

3. Refer Dogwood Corners response to Siting Board Staff's First Request for Information (Staff's First Request), Item 26. Provide an update to the selection of the Point of Interconnection.

4. Refer to the Application, Compliance with Local Ordinances and Regulation at 7 and Dogwood Corners response to Staff's First Request, Item 11. Provide a status update new developments regarding Christian Circuit Court Case No. 2022-CI-01010.

5. Refer to Dogwood Corners response to Staff's First Request, Item 15. Explain when Dogwood Corners will request a deviation from the Christian County Ordinance.

6. Refer to Dogwood Corners response to Staff's First Request, Item 15. Explain why Dogwood Corners cannot acquire more property to meet the requirements of the Christian County Fiscal Court Ordinance.

7. Refer to KRS 278.710(1)(e). Explain how Dogwood Corners is in compliance with all planning and zoning requirements that existed as of the date the application was filed given there has been no legal finding from any court the Christian County Fiscal Court Ordinance is invalid.

8. Refer to Dogwood Corners response to Staff's First Request, Item 34 and Item 35. Confirm that the two spreadsheet tables provided in response to these questions show distances to the new substation location, not the substation location originally anticipated in the Application and Site Assessment Report. If these distances are still based on the originally planned substation location, update the two tables as necessary to reflect the new substation location.

9. Refer to the Site Assessment Report, Appendix D, Noise Assessment pages 1 and 7. Update the conclusion that the distance from the substation and transformers is so far away from the Sound Receptor 95 there will not be additional operational noise based upon the new substation location.



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 DEC 05 2023

cc: Parties of Record

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