

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF MT OLIVE)	
CREEK SOLAR, LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	CASE NO.
60 MEGAWATT MERCHANT ELECTRIC)	2020-00226
SOLAR GENERATING FACILITY IN RUSSELL)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
TO MT OLIVE CREEK SOLAR, LLC

Mt. Olive Creek Solar, LLC (Mt. Olive Creek), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on July 6, 2021. Commission directs Mt. Olive Creek to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 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.

Mt. Olive Creek shall make timely amendment to any prior response if Mt. Olive Creek 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 Mt. Olive Creek fails or refuses to furnish all or part of the requested information, Mt. Olive Creek 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, Mt. Olive Creek 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, Attachment I, pages 1 and 4.
 - a. Explain how the model distinguishes between short-term and long-term economic effects in Russell County from the project.

b. Explain why the model was tailored to Russell County only and not to include contiguous counties.

c. Explain whether it is reasonable to assume that some of the labor needed for the construction phase could reside in and be drawn from surrounding counties

d. Explain whether any of the 199 new jobs generated as a result of the project will last beyond year one.

2. Refer to the Application, Attachment I, page 3. Explain how \$50,000 for the average annual pay was estimated.

3. Refer to the Application, Attachment I, page 4. Explain whether the tax payments made to the county generate any new jobs, and if not, explain how much sustained stimulus is required to begin generating new public sector jobs.

4. Refer to the Application, Attachment I, page 5. Explain if increased local expenses in the construction phase were included in the model.

5. Explain the process that Mt. Olive Creek will employ to construct the fencing surrounding the boundary of the project and the noise level associated with the construction at the five nearest receptors measured in dBA.

6. Refer the Site Assessment report, page 11, the proposed language for mitigation measures. Describe the methods that Mt. Olive Creek proposes to employ to mitigate noise impact.

7. Provide a detailed proposed construction schedule.

8. Provide the distance from the substation to the five nearest sound receptors and the anticipated noise level measured in dBA.

9. Provide the distance from the string inverters to the five nearest sound receptors and the anticipated noise level measured in dBA.

10. Provide the distance from the central inverters to the five nearest sound receptors and the anticipated noise level measured in dBA.

11. Provide the distance from the BESS Heating, Ventilation, and Air-Conditioning Units to the five nearest sound receptors and the anticipated noise level measured in dBA.

12. Provide the distance from the tracking motors to the five nearest sound receptors and the anticipated noise level measured in dBA.

13. Provide a description of any construction method that will suppress the noise generated during the pile-driving process (i.e., semi-tractor and canvas method; sound blankets on fencing surrounding the solar site; or any other comparable method) that Mt. Olive Creek plans to employ and the associated reduction in noise that each method produces.

14. Provide any studies or guidelines that Mt. Olive Creek relied on to determine that noise levels from the construction and operation of the solar facility are insignificant contributors to the operational sound levels of the site.

15. Refer to the Site Assessment Report, Attachment A, Preliminary Project Layout, which shows the property boundary extending beyond the border of the map. Provide a new map to accompany the Preliminary Project Layout that includes the T. Wethington Road area. Include the same layers and legend in this map.

16. Refer to Application, Attachment A, Context Map. Revise the map to coincide with the property boundary in the Preliminary Project Layout. Revise the 2,000-


foot buffer and two-mile buffers accordingly and include the R.F. Tarter Wildlife Management Area.

17. Refer to Application, Attachment I, Economic Report. Explain in detail whether the absence of the northernmost property in the T. Wethington Road area has any effect on this report.

18. a. Identify the number of property owners that have executed lease agreements with Mt. Olive Creek for the proposed solar facility site; and

b. Provide a copy of each lease agreement referenced above.

19. Refer to the questions propounded by Harvey Economics, which are attached as an Appendix to this information request, and provide responses to those questions.


_____ for
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
Frankfort, KY 40602

DATED JUN 18 2021

cc: Parties of Record

APPENDIX

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY
STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION
SITING IN CASE NO. 2020-00226 DATED JUN 18 2021

SIXTEEN PAGES TO FOLLOW

**FIRST SET OF INQUIRIES ABOUT THE MT OLIVE CREEK SOLAR, LLC
APPLICATION FOR A CONSTRUCTION CERTIFICATE**

The following set of questions are pursuant to our review of the Site Assessment Report (SAR) provided by Mt Olive Creek Solar, LLC (Applicant) as part of the application submitted to the Kentucky State Board of Electric Generation and Transmission under KRS 278.706. Harvey Economics (HE) has been retained by the Kentucky Public Service Commission to perform the review and evaluation of the SAR. These questions are intended to gain a more complete understanding or clarification of the materials provided about the proposed Mt Olive Creek Solar Project, to be located in Russell County, KY, and to request information that was not found in the Application. HE requests that responses to these questions be provided in writing, supplemented by attachments as needed. HE will clarify any questions which are unclear to the Applicant. Along with Staff, HE will review the Applicant responses and seek a follow-up discussion confirming our understanding with the appropriate Mt Olive Creek Solar personnel as needed.

- I Construction phase activities—Generally, much more information was provided about the operational phase compared with the construction phase. Since impacts will occur during the construction phase, HE is requesting more information about construction, summarized below and detailed in subsequent inquiry categories.**
- A. Both the Economic Report and the Noise and Traffic Study suggest a construction period of 8 to 12 months. Is that the most accurate and up to date assumption for the construction period? If yes, for the purposes of evaluating potential construction related impacts, HE will assume a 12-month construction timeframe to avoid under-stating impacts. Please confirm.
 - B. Please provide a detailed description of construction activities, including a construction timeline and schedule.
 - C. Will construction activities occur sequentially across the entire Project site, or will different activities take place at different times in different areas?
 - D. When will the peak activity period occur and how long will the peak period last?
 - E. Various places throughout the Application note an average of 150 construction workers required to construct the Project.
 - 1. Please confirm the average of 150 workers on-site at any one time.
 - 2. How many construction workers will be on-site during the peak period?
 - F. How many worker commuter vehicles will be on-site at the following times:
 - 1. An average day?

2. During the peak period?
 3. What is the assumption of workers per vehicle traveling to the Project site?
- G. Will construction activity take place:
1. On Saturdays?
 2. On Sundays?
 3. If construction is anticipated to occur on the weekends, what are the anticipated hours of activity on Saturdays and Sundays?
- H. The Application states that construction work will occur between the hours of 7am and 9pm.
1. How often will construction work take place after 6pm?
 2. What activities would occur during that time?
- I. Are any special construction activities or personnel required to connect the Project to the existing transmission line, and if so, please describe.

II Site development plan—We need to better understand certain elements of the site development plan.

- A. How many solar panels will be installed on-site?
- B. The Application states that “A fence meeting the National Electric Safety Code requirements, typically a six-foot fence with three strings of barbed wire at the top, will enclose the facility.”
1. Will that fencing be located along the Project boundary line?
 2. Will additional fencing be placed around the Substation and Interconnection Equipment area?
 3. Will fencing provide a visual block or be transparent?
- C. The Application also states that “all entrances to the site will be gated and locked at all times when workers are not active on the site.”
1. Will any other security measures be in place during construction?
 2. Will any other security measures be in place during operations?
 3. Will Mt Olive Creek staff coordinate security with local law enforcement agencies?

D. Map Inconsistencies

1. SAR Attachment A – Preliminary Project Layout (map)--The Parcel Boundary line is unclear for the northeastern most portion of the property (east of Millerfield Road). Please revise the map to show the full Project boundary enclosed in the thick orange line.
2. The Project Outline included on the Mt Olive Solar Context Map (Attachment A of the Application) (incorrectly referred to as the Horseshoe Bend Solar Project Outline) does not appear to include the entire Project site in the northeast corner. The outline on this map is not consistent with the Preliminary Project Layout Map (Attachment A of the SAR), the Tax Parcel Map included in the Property Value Impacts Report (Attachment B of the SAR), or the Boundary Survey (Attachment E of the SAR). Please explain the difference, or revise.

E. Staging Areas and Access

1. Will any construction staging areas be developed onsite within the Project boundary?
 - a. If not, please confirm that the following statement included in the Cumulative Environmental Assessment (attached to the Applicant's Motion for Deviation) is incorrect: "Approximately 10 to 15 acres of the Project site will be used as construction assembly areas for worker assembly, vehicle parking, and material storage during construction."
 - b. If yes:
 - i. Please identify the location(s) of the construction staging area(s)
 - ii. How many acres will each construction staging area be?
 - iii. Will the construction staging areas be paved? Or gravel?
 - iv. Will worker parking also be located within the staging area(s)?
 - v. Will the staging area(s) have their own separate security fencing?
 - vi. Will the staging area(s) be removed and returned to their original conditions once construction is complete?

2. Nine individual construction entrances are located on the map. Are there certain entrances that would be considered the primary access points to the Project site during construction?
3. Will the nine access points identified as construction entrances also be used for access during operations?

F. On-site buildings

1. The Application states “There is likely to be no permanent project office building on site. If there is a permanent building on site, it will likely be a trailer or container to store operations and maintenance equipment and parts.”
 - a. In contrast to the statement above, the Cumulative Environmental Assessment attached to the Applicant’s Motion for Deviation states that “An operations and maintenance building will remain on site during the life of the Project”. Please reconcile the permanent building plan.
 - b. If a permanent building will be constructed, what is the likely location of that structure on the Project site?
2. The Cumulative Environmental Assessment attached to the Applicant’s Motion for Deviation states “Temporary construction trailers intended for material storage and office space will be parked onsite” If any temporary building facilities will be located onsite, please identify the location(s) of such facilities.

G. Please confirm that the existing transmission line on the map is the Sewellton Jct – Webbs Crossroads 69kv transmission line, which will serve the facility and carry electricity generated by the Project.

H. Approximately how many miles of internal roadways will be developed within the Project site? Will internal roadways be gravel?

I. Section 1 of the SAR (Description of Proposed Facility) lists a number of proposed setbacks from “the Potential Project Footprint”. Does that mean minimum distances to the Project boundary line?

J. Distances to structures

1. Please provide a detailed table showing the number of residential structures located within 300 foot intervals from the Project fence line, i.e. from 0 – 300 feet, from 300-600 feet, up to 2,100 - 2,400 feet.
2. Please provide a detailed table showing the number of non-residential structures, by type of structure (ie church, school, commercial, barn, etc.)

located within 300 foot intervals from the Project fence line, from 0 – 300 feet up to 2,100 - 2,400 feet.

3. Please provide a map indicating residences within 300 feet of the Project fence line and a table stating the distances (within 10 feet) of those residences to the fence line.
 4. Please provide a detailed table showing the number of residential structures located within 300 foot intervals from the nearest solar panels, from 0 -300 feet up to 2,100 - 2,400 feet.
 5. Please provide a detailed table showing the number of non-residential structures, by type of structure (ie church, school, commercial, barn, etc.) located within 300 foot intervals from the nearest solar panels, from 0 - 300 feet up to 2,100 - 2,400 feet.
 6. Please provide a map indicating residences within 300 feet of the nearest solar panels and a table stating the exact distances of those residences to the nearest panels.
 7. What is the distance between the cemetery and the nearest solar panel?
 8. What is the distance between the cemetery and the nearest inverter?
- K. Please confirm that there are 12 different parcels included in the Project site. Are there also 12 separate lease agreements with participating property owners?
- L. Will any existing structures on the Project site be demolished or removed in order to accommodate the Project?

III Setback Deviation Request—The Application indicates that a deviation of the statutory setback provisions will be requested. We acknowledge the filing of the Motion for Deviation from Setback Requirements from the Applicant.

- A. What is the justification for requesting such a deviation, i.e. loss of generation capacity, cost, etc.?
- B. Could the solar panels and other structures be re-configured within the site boundaries to meet the setback requirements?

IV Property values and land use—Local landowners are often concerned about the effects on their property values during construction and operation. HE requests information about current property values in the area surrounding the site. We also need clarification on certain aspects of the Property Value Impact Report (Kirkland report).

- A. What are the current property values of each property adjacent to the Project site?

- B. Please provide property values of raw land or residential structure values per constructed square foot of developed property in Russell County in the vicinity of the Project site.
- C. The Kirkland Report states that the Project will be constructed on a portion of a 526.02 acre assemblage. The data in the Boundary Survey (Attachment D of the SAR) indicates a total Project site acreage of about 560 acres. Please confirm the correct total acreage included in the Project site.
- D. Please confirm that the solar panels and other infrastructure will cover 475 acres of the total Project site.
- E. Pages 4 and 5 of the Kirkland report provide information on parcels adjacent to the Project area.
 - 1. What is the source of that data? Please confirm that the data is consistent with that of the Russell County PVA.
 - 2. We would like Mt Olive Creek Solar LLC to confirm the Kirkland report stated distances between residential homes on adjacent properties and the closest solar panels are consistent with those provided under II. J. requested above.
 - 3. Please confirm that, for those parcels where the distance between the home and the nearest solar panel is stated as N / A, that the N / A designation is because there is no residential structure on that property.
 - 4. One adjacent property is identified as Commercial. What commercial activities occur on that property?
- F. The matched pair analyses included on pages 100 – 108 of the Kirkland report note the degree of vegetative buffer associated with the properties adjacent to the solar facilities, with the buffers described as light, medium or heavy.
 - 1. What are the definitions of light, medium or heavy buffers, in terms of amount of vegetation?
 - 2. How was the level of buffering at each location measured or evaluated?
 - 3. What portion of the designated level of buffer reflect the existing vegetation in the area vs. the solar company's mitigation plantings?
 - 4. Was the characterization of the level of buffer (light, medium or heavy) for different projects completed consistently in such a way that a light buffer for one project is comparable to a light buffer of another project?
 - 5. What are the main conclusions of the landscaping analyses provided on page 104 of the report?

V Traffic—Increased traffic from construction and operation can be an issue for local residents. HE is seeking information about construction phase traffic which was not provided in the Application.

A. Construction phase

1. The Noise and Traffic Study suggests that US Route 127 will carry the bulk of all construction traffic. Please confirm that understanding.
 - a. Which direction will that project-related traffic predominately come from heading onto the Site from US Route 127?
 - b. Will any temporary stop lights be installed during construction to help control the flow of traffic along US Route 127 or other roads? If not, specifically what other traffic control measures will be taken and where?
 - c. Figure 6 of the Noise and Traffic Study describes daily construction vehicles on the various roads leading to the Project site.
 - i. Are these daily construction vehicle figures averages or maximums? Please indicate the highest number of construction vehicles that will travel each of these roads.
2. Will any residents experience issues accessing their residences during or after construction?
3. Please provide an approximate percentage breakdown of where the construction workers will commute from each day, if possible.
4. Are all workers anticipated to commute from their homes daily, or will any temporary housing be developed on-site?
5. Please provide an approximate breakdown by point of origin for the traffic from other construction-related vehicles (i.e., component delivery vehicles, trailers, etc.).
6. The Noise and Traffic Study describes the type of trucks and equipment by weight class that will access the site.
 - a. The Study states that “a maximum of 15 trucks (Class 9) are anticipated to deliver components daily”. Please provide a breakdown of the traffic volume by truck category on an average day.
 - b. Please provide a breakdown of the traffic volume by truck category on a peak day.

7. With regards to the weight of the loads for the various deliveries to the site; please elaborate on the short-term impacts anticipated from Route 127 to KY Route 1545 or KY Route 76.
 - a. Are those roads classified for the weights of vehicles required by the Project?
 - b. The Application states that “Mt Olive Creek or its contractors will fix or pay for damage resulting from any vehicle transport to the project site, as may be required by the applicable transportation permits obtained from State and local road authorities” Does this mean Mt. Olive Creek will pay or fix any road damage if requested?
8. Section 3.2 of the Noise and Traffic Study states “There is no left turn lane at the KY Route 76 intersection, though there are full-width paved shoulders that can be used for through-traffic to pass stopped left turning vehicles, which reduces potential conflicts from additional traffic”.
 - a. We assume that this statement refers to the intersection of KY Route 76 and US Route 127. Is that correct?
 - b. Is the use of full-width paved shoulders for through-traffic to pass stopped left-turning vehicles a legal option?
 - c. Is this the safest option at that location? Please describe this solution in more detail.
9. Have you met with the Russell County Road Department or the Kentucky Transportation Cabinet about traffic management at this or other intersections? If so, please describe the scope and resolution of those discussions.
10. The Noise and Traffic Study suggests that traffic stoppages may occur on Sano Road, Miller-Short Road, Mt Olive Creek Road, and/or Huff Lane/T Wethington Road during construction.
 - a. How often would stoppages occur on each road?
 - b. How long would each stoppage period last?
 - c. What time of day would the stoppage occur?
 - d. What is the Company’s plan for managing these stoppages?
11. Does Sano Road become a County Road east of the Junction with Sulphur Creek Road?

12. What are the traffic volumes along Sano Road through the Project site to Mt. Olive Creek Road?

A. Operational phase

1. Please provide data regarding the weight and frequency of each vehicle category that will be traveling to the site during operations.

VI Dust—Dust especially during the construction phase can be an issue for local residents.

A. Construction phase

1. The Noise and Traffic Study states that fugitive dust emissions impacts are anticipated to be minor. What is the basis for that conclusion?

2. The Noise and Traffic Study states that “Water will be applied in accordance with industry best practices to control dust along site roadways and clean equipment and vehicles when needed”. Please elaborate on industry best practices; what is the protocol or schedule regarding the frequency of spraying down dirt/ gravel roads with water?

3. Will there be odor impacts from diesel fumes or other sources from construction vehicles that will be noticeable by nearby residents?

B. Operational phase

1. Will the Project site be irrigated to promote vegetation growth and reduce potential erosion?

VII Noise—Similar to dust and traffic, noise especially during construction, can be an issue for local residents.

A. Construction phase

1. Does the “Proposed Distance to Residences” shown in Table 1 of the Noise and Traffic Study refer to the distance between residences A – P and the Project boundary, the nearest solar panel, or the nearest noise source?

2. The distances of the residences in Table 1 of the Noise and Traffic Study are expressed in “at least” numbers. To ensure we are looking at worst case impacts, we will assume that those are the exact distances. If not please provide more precise detail i.e., to the nearest 10 feet.

3. Please expand Table 2 of the Noise and Traffic Study to 2,500 feet or to the point at which noise is reduced to 55 dBA.

4. Please provide a table that combined the information presented in Tables 1 and 2 of the Noise and Traffic Study to show how many houses are at each distance and what level of noise they will experience during the construction period.
5. How many days, or weeks, will any single-family home experience periodic noises greater than 55 dBA throughout a day?
6. Please provide the number of noise receptors, such as homes, that are within 300 feet of noise generation sources that produce 55 dBA or more during construction by distance and corresponding dBA.
 - a. How many days and what hours during the day will this level of noise be produced?
7. Please provide the number of noise receptors, such as homes, that are between 300 feet and 600 feet of a noise generation s sources that produce 55 dBA or more during construction by distance and corresponding dBA.
 - a. How many days and what hours during the day will this level of noise be produced?
8. For construction activities occurring after 6pm, what are the average and peak noise levels during this period in those areas where active construction is occurring?
9. Has the Applicant met with or coordinated with the area church to ensure noise from construction activities will not interfere with any church activities?
10. The Noise and Traffic Study indicates that the local sound environment has significant ambient noise coming from State Routes 1729 and 76.
 - a. Would the noise from this traffic only affect noise receptors in the vicinity of those roads?
 - i. How many noise receptors are within 300 feet of either of those routes and the Project boundaries?
 - ii. How many noise receptors are within 600 feet of either of those routes and the Project boundaries?
 - b. What is the basis for the statement that the ambient noise around the Project is between 50 and 60 dBA?
 - c. Has an ambient noise study been completed? If so, please provide that study.

- d. Is traffic on these routes the primary source of ambient noise?
- e. Please provide the average daily and peak hourly traffic volume producing ambient noise within 600 feet of the Project boundary

B. Operational phase

1. The Application states that either string inverters or central inverters will be used in the Project. In order to evaluate a worst-case noise scenario, we will assume central inverters will be used.
 - a. Please confirm that there will be 15 central inverters and 15 energy storage systems (co-located).
 - b. The Noise and Traffic Study refers to energy storage HVAC units or BESS HVAC units. Please confirm those are the same as the energy storage systems.
2. Please provide a table showing the number of residential structures located within 300-foot intervals from the nearest inverter, from 0 -300 feet up to 2,100 - 2,400 feet.
3. Please provide a detailed table showing the number of non-residential structures, by type of structure (ie church, school, commercial, barn, etc.) located within 300 foot intervals from the nearest inverter, from 0 -300 feet up to 2,100 - 2,400 feet.
4. Please provide a detailed table showing the number of residential structures located within 300 foot intervals from the substation, from 0 - 300 feet up to 2,100 - 2,400 feet.
5. Please provide a detailed table showing the number of non-residential structures, by type of structure (ie church, school, commercial, barn, etc.) located within 300 foot intervals from the nearest substation, from 0 -300 feet up to 2,100 - 2,400 feet.
6. The Applicant indicates that the total sound level would only increase by approximately 1.5 dBA above ambient sound levels by the installation of a single source. Please indicate the total dBA including ambient noise for each of the project components at 200, 400, and 600 feet from noise receptors.
7. Is there a cumulative noise effect for the inverters, BESS HVAC units, substation, and tracking motors during daytime hours?
 - a. In yes, please provide the cumulative dBA produced by all noise sources (inverters, BESS HVAC units, motors, substation) from the substation and the distance to the nearest noise receptor.

- b. Will all these components be completely silent at night?
- 8. How many tracking motors will be installed on-site?
 - a. The transformer was not addressed in the Sound Impact Evaluation.
- 9. Will the transformer be co-located with the sub-station?
 - a. If not, please indicate the dBA of the transformer at 200, 400 and 600 feet, respectively.

VIII Topography/ Scenery—Visual impacts can be important for some projects, depending on the topography, surrounding land uses, and the nature of the project.

A. Construction phase

- 1. Will any existing vegetation (trees, bushes, etc.) be removed from the Project site to accommodate construction activities or to make room for solar infrastructure? This would include existing vegetation located along the Project boundary line or within the overall Project site.

B. Operational phase

- 1. Has a visual impact assessment or other visual impact study been completed for the Mt Olive Creek Project? If so, please provide that study.
- 2. The revised Preliminary Project Layout map (included in the Applicant's supplemental filing) indicates proposed vegetative buffers in six specific locations. Please provide an explanation of why those specific locations were chosen.
 - a. What criteria were used to evaluate the need for a buffer in a certain location, or to determine that an additional buffer was unnecessary?
- 3. Are there existing visual buffers in place for all other residences/ properties surrounding the Project site or within sight of solar panels?
 - a. Will some residences in areas that do not include a proposed vegetative buffer be able to see the Project?
- 4. Will the proposed vegetative buffers be located outside the Project fencing?
- 5. The solar panels are described as 15 feet in height and the mature shrubs are anticipated to be 15 feet in height. Did you consider any elevational

factors (i.e. valleys and hills) when evaluating visual impacts and the need for buffers?

6. The Application states that evergreen shrubs will grow to a mature height of 15 feet. How many years will it take for the shrubs to reach that height?
7. Will any other forms of visual barrier be implemented between the time of shrub planting and the time that those shrubs will reach mature height?
8. Will the same evergreen shrubs be used as the vegetative buffer in all locations?
9. Please describe the plan for maintaining the shrubs and replacing dead shrubs throughout the operational period.
10. We are aware of the Surrounding Area Images photos provided in Attachment D to the SAR, which includes two computer generated images of views with panels, fencing and vegetative buffers at different locations.
 - a. In the first computer generated image (panels, fencing and buffers superimposed on Photo 2), it appears that panels in that location (as seen on the righthand side of the photo) would be visible to drivers and others on T. Wethington Rd. Is that correct?
 - b. In the second computer generated image (panels, fencing and buffers superimposed on Photo 9), it appears that existing vegetation will be removed from the area. Is that correct? The panels in that location appear to be quite visible from Sano Road.
 - c. Have you generated any additional computer-generated images portraying the solar panels, six-foot fence, and newly planted shrubs after construction is complete? If yes, please provide them.
11. Has a glare study been completed to evaluate the potential for any types of glare at any locations surrounding the Project site? If yes, please provide a copy of that study.
12. Will the Project use anti-glare panels?
13. The SAR states that “The Project will also be visible from Millerfield Road (HWY 76), which is classified as a rural minor collector. Millerfield Road (HWY 76) is a more frequently traveled road, and therefore the Project has proposed to fully buffer the view from Millerfield Road (HWY 76) with vegetative buffering to obscure the view of the facility.” Will that buffering eliminate the risk of glare immediately or how long will it take to buffer the Project facilities from Millerfield Road?

14. Will there be any glare affecting drivers on other roads surrounding the Project site, including Sano Road, W Sulphur Creek Road, or Mt Olive Creek Road, as the panels rotate over the course of the day during different times of the year?
15. Will any residences surrounding the Project site experience glare as the panels rotate over the course of the day during different times of the year?
16. Will the Company ensure that there are no glare impacts resulting from Project operations?
 - a. If glare occurs, how will glare be mitigated?

IX Public awareness/ involvement/ meeting materials—We want to make sure that the information in the Application is consistent with the information provided to the public thus far.

- A. We are aware of the following attachments to the Application: Proof of Notice of Application (Attachment B), Public Involvement Activities (Attachment E), and Public Meeting Documentation (Attachment F). Please provide any additional documents/ maps/ graphics/ other materials that have been presented to the community/ other groups as part of outreach efforts, if applicable.
- B. What specific issues or concerns have been brought up by the public or others as the result of public meetings or through other avenues?
- C. Are full transcripts available for the public meetings? We request any written or oral comments offered by the public or government agencies.
- D. Do you know how many individuals attended the public meetings?
- E. Have issues or concerns been brought up from the public or others regarding the small cemetery located just north of Sano Road on the west side of the Project?
- F. Is there, or will there be, a plan in place to coordinate with local landowners or others in case of complaints or other issues that arise during the course of construction or operations?

X Other permitting activities—HE wants to confirm information provided by the Applicant is consistent with information provided in other permitting processes.

- A. Section 6 of the SAR (Mitigation Measures) lists other permits which Mt Olive Creek Solar may have already obtained or will obtain from other agencies before construction or operation. Please provide copies of any submittals to those agencies, other than those provided, that address any of the specific topics addressed in this inquiry.

XI Economic Report (Attachment I of the Application)—This topic is not specifically called for in these applications, but the Board will have an interest in Project benefits.

- A. The Economic Report notes an anticipated investment of “approximately \$90 - \$120 million.”
1. How much money is likely to be spent on purchases of materials, supplies, equipment or other items in Russell County in support of facility construction?
 - i. How much sales or use tax revenue would be generated for Russell County due to construction activity?
 2. How much money is likely to be spent on purchases of materials, supplies, equipment or other items outside of Russell County, but within the Commonwealth of Kentucky in support of facility construction?
 - i. How much sales or use tax revenue would be generated due to construction activity?
 3. What will be the direct and total estimated construction-related economic impact (output) including labor costs from the Project.
 - i. For Russell County?
 - ii. For the Commonwealth?
- B. Assuming an average of 150 construction workers, what approximate percentage of those construction workers will come from Russell County (local hires)?
- C. The report states that the Project will require approximately 2 permanent positions for on-going O&M of the facility.
1. What is the expected annual salary level for those positions?
 2. Should we assume those positions will be held by Russell County residents?
- D. How much money will be spent on the purchase of materials / supplies in the local area (Russell County) each year during the operational phase?
1. What types of items would be purchased locally?
- E. The Economic Report lists the jurisdictions in Russell County that collect property taxes and the applicable 2020 tax rates.
1. How much PILOT revenue will go to each jurisdiction during years 1-20?

2. How much PILOT revenue will go to each jurisdiction during years 21-40?
- F. How much PILOT revenues will go to the Commonwealth during years 1-20?
- G. How much PILOT revenues will go to the Commonwealth during years 21-40?

XII Decommissioning – This topic is not specifically called for in these applications, but the Board does have an interest in decommissioning activities and commitments.

- A. Please confirm that the expected life of the Project is approximately 40 years.
- B. Section 6 of the SAR (Mitigation Measures) states the following: “Mt Olive Creek, its successors or assigns, shall decommission the entire site if the Project ceases producing electricity for a period of more than twelve (12) months. Decommissioning shall involve the removal of all solar panels, racking, and equipment including concrete pads and trenched electrical wiring. Fencing and internal access roads shall also be removed, unless the landowner states in writing that they prefer fencing and internal roads to remain in place.”
1. Please provide a description of decommissioning plan, including what will happen to the facilities/ structures on site.
 2. Will the Project site be returned to pre-existing conditions?
 3. What commitments regarding land restoration are included in the landowner lease agreements?
 4. Will you agree to remove all facilities above and below ground, except those requested to remain by the landowners?
 5. Will you agree to a decommissioning bond?

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