

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 SECOND 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 January 23, 2023. The Siting Board directs Thoroughbred Solar 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

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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).

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.

Thoroughbred Solar shall make timely amendment to any prior response if Thoroughbred 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 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 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. 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 operations of the project.

2. Provide documentation concerning the continuation or termination of the United States Department of Agriculture's (USDA) Conservation Reserve Enhancement Program (CREP).

3. Provide information about the contractual aspects of the CREP program in relation to the property where the project is to be located, and state whether the property where the project is to be located is exempt from membership in the program. If the property is exempt, provide documentation of this.

4. Provide details regarding contact with the National Cave Museum and Library (Museum) about the proposed solar facility location. Include any information about discussions relating to karst, underground cave systems, and sinkholes. If no contact has been made with the Museum, please indicate when this contact will be made.

5. Provide details regarding contact with Mammoth Cave National Park (Mammoth Cave) about the proposed solar facility location and its relation to karst features in the area. If no contact has been made with Mammoth Cave, please indicate when this contact will be made.

6. Provide a design plan for the project that notes the different foundations and footings that will be used in construction. Include the foundation and footing designs for the proposed substation and O&M building.

7. Refer to the response to Siting Board Staff's First Request for Information (Staff's First Request), Item 37. For each of the construction phases listed in Updated Table 4, provide an estimated length of each phase. Include in the estimate the length of time each phase will overlap.

8. Provide an estimate of when the peak of construction activity will occur.

9. Provide an estimate of how long the peak construction period will last.
10. Provide baseline traffic volume data for portions of US 31W to the north and to the south of the intersection of US 31W and State Highway 335. Include the peak AM and peak PM traffic volume.
11. Provide a description of existing road conditions for US 31W near the project area.
12. Provide an estimate of what portion of construction traffic would access the local roads around the project site from US 31W and what portion of construction traffic would access local roads around the project site from the southern portion of State Highway 335.
13. Refer to the Application, Exhibit 12, Attachment G, page 8, Table 2 and page 23, Table 8. Explain whether the sound pressure levels presented in these tables reflect both the project operations and existing ambient noise levels described in the response to Staff's First Request, Item 35.
14. Confirm that the majority of capital expenditures, including purchases of solar panels and other major materials, will occur outside of Kentucky.
15. Explain what types of material, supplies, or equipment would be purchased within Hart County for the construction of the project.
16. Provide an estimate of the total property tax revenues generated for Hart County over the 35-year operational period of the project if an Industrial Revenue Bond (IRB) or a Payment in Lieu of Tax (PILOT) agreement is not made.
17. Provide the distribution of Hart County property tax revenues to applicable local entities, including school districts.

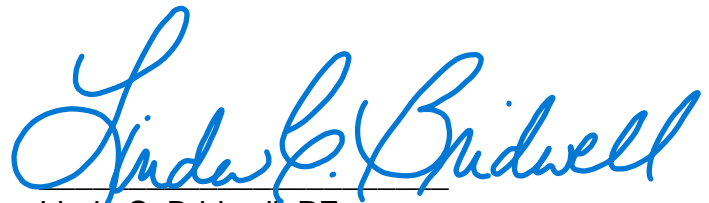
18. Refer to the Application, Exhibit 12, Attachment Q, page 11. Confirm that the decommissioning cost estimates provided encompass all project components and restoration work required on the entire 530-acre Project site.

19. Refer to the response to Staff's First Request, Item 38. Provide details on how the complaint resolution process will work.

20. Describe the improvements necessary for John's Lane so that construction delivery vehicles will be able to deliver the transformer to the proposed substation location.

21. Explain whether any improvements are necessary to the bridge on Kentucky Route 335, west of US 31W to accommodate construction traffic.

22. Refer to the Application, Exhibit 12, Site Assessment Report (SAR), Section 6.1.1, page 16. Also refer to the response to Staff's First Request, Item 20. The SAR states that the weight of the transformer is approximately 120 tons. The response to Item 20 states the weight of the transformer is approximately 56 tons. Confirm the correct weight of the transformer.



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 09 2023    

cc: Parties of Record

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