

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF SEBREE	)	
SOLAR II, LLC FOR A CERTIFICATE TO	)	
CONSTRUCT AN APPROXIMATELY 150	)	CASE NO.
MEGAWATT MERCHANT SOLAR ELECTRIC	)	2022-00131
GENERATING FACILITY IN HENDERSON	)	
COUNTY, KENTUCKY PURSUANT TO KRS	)	
278.700 AND 807 KAR 5:110	)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION  
TO SEBREE SOLAR II, LLC

Sebree Solar II, LLC (Sebree Solar II), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 21, 2023. The Siting Board directs Sebree Solar II 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 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

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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).

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.

Sebree Solar II shall make timely amendment to any prior response if Sebree Solar II 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 Sebree Solar II fails or refuses to furnish all or part of the requested information, Sebree Solar II 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, Sebree Solar II 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 any written communication, or a summary of conversations, with the Henderson County Road Department regarding road use agreements and road safety during construction and operation of the project.

2. Provide any geotechnical reports or surveys that have been conducted for the project. If no geotechnical survey has been completed to date, provide an estimate of when it will be completed.

3. Provide the stormwater management plan for the project.

4. Provide a one-page map that shows both the Sebree Solar II project and the project in Case No. 2021-00072.<sup>2</sup> In the map, clearly distinguish between the projects. Include the solar arrays for each project, state/county roads, access roads, substation, collector substation, collection lines, solar meteorological station, and control houses.

5. Texas Gas Transmission LLC has two pipelines carrying natural gas through the project.

a. Explain if any access roads or collection lines will cross over the pipelines.

b. Provide any communication, or summary of oral communication, with Texas Gas Transmission LLC regarding the project and the natural gas pipelines.

6. Provide any communication with Henderson County Water District regarding supplying water for construction or operations of the project.

7. Refer to the Application, Exhibit 10, Attachment A. Confirm whether Sebree II intends to pursue an Industrial Revenue Bond (IRB) and a Payment In Lieu Of Taxes (PILOT) Agreement with Henderson County, or any other form of tax abatement with Kentucky.

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<sup>2</sup> Case No. 2021-00072, *Electronic Application of Sebree Solar, LLC for a Certificate to Construct an Approximately 250 Megawatt Merchant Solar Electric Generating Facility and Approximately 4.5 Mile Nonregulated Electric Transmission Line in Henderson County, Kentucky and Webster County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110* (Ky. PSC Feb. 9, 2022).

8. Refer to Sebree Solar II's Response to Siting Board's First Request for Information (Response to Staff's First Request), Item 20.

a. Confirm whether only county-level data for Henderson County was considered when calculating the secondary economic impacts for the construction phase.

b. Provide the secondary economic impacts of the construction phase of the project using state-level data.

9. Refer to the Response to Staff's First Request, Item 21. Confirm that there are no occupational taxes for Henderson County.

10. Refer to the Response to Staff's First Request, Item 21.

a. Explain why sales taxes cannot be estimated for the project.

b. Based on prior solar facility development experience, provide the estimated proportion of in-state versus out-of-state materials purchased for the project during the construction phase for this project.

11. Refer to the Response to Staff's First Request, Item 12. Since the construction dates of the other projects are not known, based upon the public information available, perform an analysis of the cumulative construction noise from Sebree Solar II, the project in Case No. 2020-00242,<sup>3</sup> and Case No. 2020-00391<sup>4</sup> using the assumption all would be under construction at the same time.

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<sup>3</sup> Case No. 2020-00242, *Electronic Application of Unbridled Solar, LLC for a Certificate of Construction for an Approximately 160-Megawatt Merchant Electric Solar Generating Facility and Nonregulated Electric Transmission Line in Henderson and Webster Counties, Kentucky*. (Ky. PSC June 4, 2021).

<sup>4</sup> Case No. 2020-00391, *Electronic Application of Henderson County Solar LLC for a Certificate of Construction for an Approximately 50-Megawatt Merchant Electric Solar Generating Facility in Henderson County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:100* (Ky. PSC Dec. 22, 2021).

12. Refer to the Response to Staff's First Request, Items 12 and 13. Provide any communication Sebree Solar II has had with the developers of the other solar projects in Henderson County to determine if the construction schedules will overlap.

13. Refer to the Response to Staff's First Request, Item 14. The response did not address the cumulative effect on property value of four projects sited in close proximity. Provide an updated response that evaluates the effect on property values when there are multiple projects within one county.

14. Provide the anticipated number of years for project operations.

15. Refer to the Response to Staff's Second Request, Item 37. Explain the method Sebree Solar II utilized to state 200 full time equivalent jobs will be created by the project if "[t]he Project has not secured an Engineering, Procurement, Construction (EPC) contract to be able to identify and specify the exact numbers to put against the type of job listed in Exhibit 10, Attachment A, page 10."



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  JUL 07 2023

cc: Parties of Record

\*L. Allyson Honaker  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 6202  
Lexington, KENTUCKY 40509

\*Brian Bishop  
Executive Director of Henderson County Planning  
,

\*Brittany H. Koenig  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 6202  
Lexington, KENTUCKY 40509

\*Jason Andrews  
NextEra Energy Resources, LLC  
700 Universe Boulevard  
, FLORIDA 33408

\*Nathaniel Comer  
1317 Judson Place  
Henderson, KENTUCKY 42420