

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF FRON BN, LLC	)	
(FRONTIER SOLAR) FOR A CERTIFICATE OF	)	
CONSTRUCTION FOR AN APPROXIMATELY 120	)	
MEGAWATT MERCHANT SOLAR ELECTRIC	)	CASE NO.
GENERATING FACILITY AND NONREGULATED	)	2023-00360
ELECTRIC TRANSMISSION LINE IN MARION	)	
AND WASHINGTON COUNTIES, KENTUCKY	)	
PURSUANT TO KRS 278.700 AND 807 KAR	)	
5:110	)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION  
TO FRON BN, LLC

FRON BN, LLC, (Frontier Solar), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 25, 2024. The Siting Board directs FRON 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

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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).

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.

Frontier Solar shall make timely amendment to any prior response if Frontier Solar 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 Frontier Solar fails or refuses to furnish all or part of the requested information, Frontier 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, Frontier Solar shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Submit a copy of the leases or purchase agreements, including options, separate agreements, or deeds that Frontier Solar has entered into in connection with the proposed solar facility, including the agreements for each of the parcels of the project.

2. Detail any contracts by which Frontier Solar has paid, has negotiated to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near the project. Include the terms of the agreements and which properties are involved in terms of distance to the project boundaries.

3. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, including the length of each construction phase. Include when the peak construction would occur within the timeline.

4. Provide what time of day construction, operation and maintenance activities will begin and end each day.

5. Provide a narrative description of the location to each of the following site features:

- a. Each construction entrance.
- b. Each entrance to be used in operations.
- c. Operations and maintenance (O&M) area.
- d. Each laydown area.

6. Provide a detailed table listing all residential structures located within 2,000 feet of the Project boundary line. For each structure, provide the following:

- a. The distance to the boundary line.
- b. The distance to the closest solar panel.
- c. The distance to the nearest inverter.
- d. The distance to the substation.

7. Provide a detailed table listing all non-residential structures located within 2,000 feet of the Project boundary line. For each structure, provide the following:

a. A description of any structure (barn, commercial building, warehouse, church, etc.).

b. The distance to the boundary line.

c. The distance to the closest solar panel.

d. The distance to the nearest inverter.

e. The distance to the substation.

8. Refer to the Application, Record of Environmental Violations, page 11. Provide the entities with a direct ownership interest in Frontier Solar. Also provide the corporate structure of those entities.

9. Provide a list of permits that will be required from any other local, state, or federal agencies for the project. Include in the response the status of those permits.

10. Refer to the Site Assessment Report (SAR), Exhibit A, Preliminary Site Layout. Provide a one-page site map that contains the locations water features, including rivers, streams, lakes, and ponds. Also include any known or suspected karst features.

11. Explain whether the perimeter security will be installed according to National Electric Safety Code standards. Include in the response whether the fencing will be installed before any electrical work begins.

12. Provide the security measures for the O&M areas and substation within the project's boundaries.

13. Explain whether any existing structures on the project site will be demolished during construction.

14. Refer to the SAR, Exhibit A, Preliminary Site Layout. Explain whether there will be vegetation clearing for construction. Provide in the response the number of acres that will be cleared and any permits that will be required.

15. Refer to the SAR, Exhibit A, Preliminary Site Layout. It appears not all proposed solar arrays have populated on the site plan. Provide an updated site plan showing all proposed solar arrays and any other updates.

16. Refer to the SAR, Exhibit A, Preliminary Site Layout. Describe what the “undulated areas” represent on the preliminary site layout plan.

17. Refer to the SAR, Exhibit A, Preliminary Site Layout Plan. Explain whether the MV collection system will be underground, aboveground, or both. If the MV collection system will be underground and above ground, provide a map that shows which segments are underground and which segments are above ground.

18. Provide the number of miles between the Frontier Solar project and the Northern Bobwhite Solar project in Case No. 2020-00208.<sup>2</sup>

19. Provide any overlaps in the projected construction schedules of both the Frontier Solar project and the Northern Bobwhite Solar project in Case No. 2020-00208.

20. Refer to the SAR, Exhibit E, Glare Study. Explain whether glare has been considered for both the Frontier Solar project and the Northern Bobwhite Solar project combined instead of on an individual project basis.

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<sup>2</sup> Case No. 2020-00208, *Electronic Application of Northern Bobwhite Solar LLC for a Certificate of Construction for an Approximately 96 Megawatt Merchant Solar Electric Generating Facility in Marion County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110* (Ky. PSC June 18, 2021).

21. Explain whether there is concern that, once completed, the Frontier Solar project and the Northern Bobwhite Solar project in Case No. 2020-00208 will produce glare from two sides of the Lebanon-Springfield Airport.

22. Provide any communication with Lebanon-Springfield Airport regarding the project.

23. Provide copies of any documents submitted to other agencies, other than what in the application.

24. Describe and provide information regarding what federal and state agencies that Frontier Solar is coordinating with regarding to the tree clearing strategy for protected bats.

25. Explain whether the Site Layout Plan will be modified after the Wetland Delineations are completed.

26. Refer to SAR, Exhibit F: Provide a map showing highlighted routes that will be used during construction. Differentiate between roads and bridges that will and will not be used for deliveries.

27. Explain whether Frontier Solar will pursue an Industrial Revenue Bond and Payment In Lieu of Taxes agreement with Marion and Washington Counties. If yes, explain how that might change the cumulative tax revenues of the Project.

28. Explain whether Frontier Solar intends to hire as many local workers for the construction and operations phases of the project as possible, all other qualifications for the positions being equal.

29. Refer to the Application, Attachment E – Economic Impact Study, sheets 14–17, tables 1–4.

a. Explain the “job years” metric used for the economic impact of the Construction Phase of the Project and its relation to the number of full-time equivalent jobs that would be created.

b. Explain why this same metric was not used for the economic impact of the Operations Phase of the Project.

30. Refer to the Application, SAR, Exhibit D, Noise Assessment Report. Provide a map that displays and labels each noise receptor listed in the report.

31. Detail any communications with members of the public, including neighboring landowners, regarding construction noise.

32. Provide a copy of the stormwater management plan for the project.

33. Provide any geotechnical reports for the project.

34. Provide any historic or archeologic studies that have been planned or completed for the project site.

35. Provide the Construction Dust Control Plan for the project.

36. Refer to the Application at unnumbered page 21. Provide a copy of the Groundwater Protection Plan.

37. Provide any communication with local emergency services on security and emergency protocols during construction and operations. If contact has not been made, explain when that contact will occur.

38. Provide who will control access to the site during construction and operations.

39. Refer to the SAR, Appendix D, Noise and Traffic Assessment Study.

- a. Provide the weight limits of each local roadway to be used for construction traffic.
  - b. Provide the number of worker vehicles traveling to the site each day during construction.
  - c. Provide the number and approximate weight classes of the heavy and light duty trucks anticipated on site per day during the construction phase.
  - d. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.
40. Identify specific roadways used by heavy trucks, including for delivery of the transformer.
  41. Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries. If yes, provide the expected locations, frequency, and length of those stoppages.
  42. Provide any communications with Marion and Washington counties' road department regarding permits or agreements necessary for the project. If no communication has been initiated, explain when that contact will occur.
  43. Provide any communication with the Kentucky Transportation Cabinet District Engineer regarding permits or agreements necessary for the project. If no communication has been initiated, explain when that contact will occur.
  44. Provide information on the specifications, model number, and cutsheets of the photovoltaic cell/solar panels to be used.
  45. Confirm whether the project have a battery storage system. If a battery storage system is going to be utilized, provide the following:



- a. Safety data sheets for the energy storage system.
- b. The environmental impact of the batter storage system.
- c. Expected life of the batteries.
- d. Method to dispose of batteries at the end of the useful life.
- e. How the battery storage system installation will comply with National

Fire Protection Association Standard 855.

46. Provide information on any fiber optic or communication network installed as a part of the project and any excavation that may be required for the installation.

47. Provide the planned time for construction to begin and end each day. Explain how Frontier Solar plans to mitigate arrivals and departures to minimize disruption to the area.

48. Provide any communication Frontier Solar representatives have had with any of the property owners surrounding the project. Explain whether any changes have been made to the project based upon those concerns.



Linda C. Bridwell, PE  
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DATED FEB 08 2024

cc: Parties of Record

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