

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF WOOD DUCK)	
SOLAR LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	
100 MEGAWATT MERCHANT ELECTRIC SOLAR)	CASE NO.
GENERATING FACILITY AND NONREGULATED)	2024-00337
TRANSMISSION LINE IN BARREN COUNTY,)	
KENTUCKY PURSUANT TO 278.700 AND 807)	
KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO WOOD DUCK SOLAR LLC

Wood Duck Solar LLC (Wood Duck Solar or Applicant), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 27, 2025. The Siting Board directs Wood Duck Solar 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

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).

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.

Wood Duck Solar shall make timely amendment to any prior response if Wood Duck 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 Wood Duck Solar fails or refuses to furnish all or part of the requested information, Wood Duck 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, Wood Duck 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. Provide an updated map identifying all participating and non-participating parcels. Include in the map: proposed solar array areas, proposed access points, and proposed inverter locations.

2. Confirm whether all proposed access points will be gated. If not confirmed, provide a response that identifies all gated access points, all ungated access points and an explanation why each access point will either be gated or ungated.

3. Describe any upgrades that will need to be made to the existing East Kentucky Power Cooperative, Inc. (EKPC) substation in preparation for the Project and its gen-tie line.

4. Provide a time frame for when vegetative screening will be planted during the construction phase of the Project.

5. Refer to the public comment 20250724_Response E-Mail to Gwynne Aidala.pdf filed on July 24, 2025, pages 3-4. Confirm whether the images accurately depict vegetative clearing on the Project site. If confirmed, explain whether such vegetative clearing has altered Wood Duck Solar's prior estimate of a maximum of 223 acres of vegetative clearing provided in response to Siting Board Staff's First Request for Information (Staff's First Request), Item 27.

6. Refer to Wood Duck Solar's response to Staff's First Request, Item 29. Explain whether any wildlife will be displaced or otherwise negatively impacted as a result of vegetative clearing. Include in the response any studies conducted relating to wildlife displacement.

7. Refer to Wood Duck Solar's response to Staff's First Request, Item 36. Confirm whether the 'six-foot game style fence' will include barbed wire. If yes, provide an updated design. If no, explain the description.

8. Refer to Wood Duck Solar's response to Staff's First Request, Item 33, Attachment Part 3, page 541. The Critical Issues Analysis report states there are "two

(2) federally endangered species, seventeen (17) state-endangered species, twenty (20) state-threatened species, and one (1) federal candidate species that have the potential to occur within the Project area. Additionally, the Project area is within two critical habitat units for the Indiana bat.” Provide the following:

a. Describe the mitigation measures Wood Duck Solar will adopt to protect these endangered species.

b. Explain what communication has occurred with United States Fish and Wildlife Service (USFWS). Provide summaries or documentation to support the response.

c. Explain what permits Wood Duck Solar will need to acquire in relation to endangered species.

d. Explain if the site layout will be revised in any way as a result of the location of the endangered species.

9. Refer to Wood Duck Solar’s response to Staff’s First Request, Item 33, Attachment part 3, page 542. Provide a map depicting the locations of the archaeological site, the three historic structures, and the three historic cemeteries. Include on the map, proposed solar array areas and proposed setbacks.

10. Refer to Wood Duck Solar’s response to Staff’s First Request, Item 33, Attachment part 3, page 542. Identify and explain whether the archaeological site, the three historic structures, or the three historic cemeteries are eligible for the National Registry of Historic Property (NRHP).

11. Refer to Wood Duck Solar’s response to Staff’s First Request, Attachment part 3, page 574. Confirm whether the site plan includes the 100-foot avoidance buffer

recommended in the report. If confirmed, provide an updated site plan. If not confirmed, explain why not.

12. Provide a map depicting all federal jurisdictional areas within the Project area.

13. Refer to Wood Duck Solar's response to Staff's First Request, Item 40. On pages 1, 2, and 3 of the Cumulative Environmental Assessment, the study refers to 'Hummingbird', a different solar project. Confirm that the findings in the report are accurate and relate solely to the Wood Duck Solar project. If confirmed, explain the assessment's reference.

14. Provide a detailed list of all local public meetings that have been held since the creation of the Wood Duck Solar Project. Include in the response the date and location of each meeting along with the name(s) of the Wood Duck Solar representatives in attendance at each meeting.

15. Refer to Application, Exhibit H, Site Assessment Report (SAR), page 4. State the number of linear feet of collection system cables that will be above ground.

16. Refer to the public comment titled 20250721_Multiple Public Comments.pdf filed on July 21, 2025, pages 7–15.

a. Provide a response to the commentor's interpretation that glare will be greater at specific residences than stated in the conclusion of the Applicant's Glare Hazard Analysis.

b. Provide a response to the commentor's concerns regarding impacts to property values as related to the referenced University of Wyoming Study.

c. Provide the addresses for the four residences on Oak Grove Church Road that will experience green glare during Project operations.

1) Indicate whether each residence is participating or non-participating.

2) Explain whether the removal or adjustment of some solar panels could reduce the glare experienced by those residences.

17. Refer to Wood Duck Solar's response to Staff's First Request, Item 33, Attachment part 1, which includes discussion of a request for pre-subdivision variances.

a. Explain, individually, what is meant by the terms "interior property lines" and "exterior property lines" and "interior" and "exterior" setbacks.

b. Explain whether the variance request would apply only to participating landowners, or whether non-participating owners would also be affected.

c. State whether the County has approved the variance request. If yes, provide the appropriate permit or ordinance.

18. Provide the total acreage of the 2,259-acre proposed Project site that is currently being used for active agricultural production.

19. Refer to Wood Duck Solar's response to Staff's First Request, Item 58, Updated Site Plan. The map notes 25 inverters under the heading Project Data. In the SAR, page 3, approximately 35 inverters are listed. State the correct number of inverters for the Wood Duck Solar Project. Provide an updated site plan map, if necessary.

20. Refer to Wood Duck Solar's response to Staff's First Request, Item 55. Explain whether the water service from Glasgow Water Company refers specifically to on-site water demands during operations (i.e., at the O&M building).

21. Refer to the SAR, page 15, which states that “[w]ater for dust control and operations will be obtained from several potential sources, including an on or off-site groundwater well, or trucked from an offsite water purveyor.” Explain whether those water supplies are in addition to the Glasgow Water Company service identified in Wood Duck Solar’s response to Staff’s First Request, Item 55.

22. Describe the size and scale of the proposed Project substation as compared to the existing EKPC substation.

23. Refer to Application, Exhibit F, Economic Analysis, page 16. The discussion and calculations related to “Lost Economic Activity from Farming” appear to be based on 1,244 acres, generally the acreage required for Project infrastructure. Provide an analysis of the economic impacts to agriculture that reflects the entire Project site of 2,259 acres.

24. Refer to Application, Exhibit F, Economic Analysis, page 17. The discussion and calculations related to “New Income from Leasing Land to Solar Company” appear to be based on 1,244 acres, generally the acreage required for Project infrastructure. Provide an analysis of the economic impacts of landowner leases that reflects the entire Project site of 2,259 acres.

25. Refer to Application, Exhibit F, Economic Analysis, page 24. Provide a revised analysis and table showing the estimated net annual Barren County impacts during operations that reflect the entire Project site of 2,259 acres.

26. Refer to Application, Exhibit I, Decommissioning Plan, page 1, which states that “it is anticipated that decommissioning will begin within six (6) months of the facility ceasing to produce electricity.” Confirm that Wood Duck Solar intends to commit to that

schedule, even though the Barren County Regulations for Solar Farms (Article 5, Section 511.2) do not consider a solar facility to be “abandoned” until a period of 12 continuous months without energy production has passed. If not confirmed, explain the response.

27. Refer to Application, Exhibit I, Decommissioning Plan, page 5, which states that “[t]he Project owned transmission line and the substation, including all components and accessories will be removed during decommissioning”. Confirm that action conforms with KRS 278.706(2)(m)(4), which states that “[u]nless otherwise requested by the landowner, leave any interconnection or other facilities in place for future use at the completion of the decommissioning process.” If not confirmed, explain why not.

28. Explain any specific commitments included in individual landowner lease agreements regarding any aspect of the decommissioning process.

29. Confirm that the EKPC will be responsible for connecting the gen-tie line between the Project Substation and the EKPC Substation. If not confirmed, explain who is responsible.

30. Explain if the EKPC Substation would require any improvements or reconfiguring before connection with the Project.

31. Refer to SAR, Attachment G, Appendix A, C202 Preliminary Landscape Plan map, and site visit. Logging has occurred on parcels where solar module Areas #18 and #21 are proposed and “existing buffer” as marked on the map has diminished. Provide a revised landscaping plan for areas that have been cleared by logging east of Millstown Rd and west of Park City-Bon Ayr Rd.

32. Refer to SAR, Attachment G, Appendix A, C202 Preliminary Landscape Plan map. The location of the Project Substation has been omitted, while the EKPC

Substation location is marked by a red rectangle. Provide a revised landscaping plan that includes: (1) the locations of both the Project and EKPC substations; and (2) planned landscape screening between the Project Substation site and the residences in the Bent Creek Drive neighborhood. If no landscape screening is planned for this area, provide an explanation as to why not.

33. Refer to Wood Duck Solar's response to Staff's First Request, Item 21, Delivery Roads Attachment. Four of the delivery access points (one each on Apple Grove Rd, Dripping Springs Rd, Mayhew Rd, and New Bowling Green Rd) are not located near Project laydown areas. Explain how and why these delivery access points were chosen.

34. Refer to SAR, Attachment D, Sound Study, Figure 3 and Figure 4. Per the site visit, it was determined that some sound receptors (receptors) are incorrectly marked as participating or non-participating (i.e., SR-114 Woodlawn Church is marked as a participating structure and SR-137 is not marked as a participating structure). Provide:

a. A revised Figure 4 – Operational Noise Contour map with corrected labels for participating/non-participating receptors.

b. A list of the 266 noise sensitive receptors that indicates whether each receptor is participating or non-participating.

35. Refer to Wood Duck Solar's response to Staff's First Request, Item 87, the Construction Noise Buffer Attachment. Provide a revised Construction Noise Contour Map that includes noise sensitive receptors; participating structures; and Project components (PV layout, inverters, substation, fence line), with noise contours marked in 5 dBA increments from 40 dBA and greater indicating the "worst case" dBA Leg levels during construction.

36. Refer to Wood Duck Solar's response to Staff's First Request, Item 87. Provide a sound model results table for all 266 noise sensitive receptors indicating the "worst case" dBA Leq levels during construction. Include the receptor IDs, sound levels (dBA Leq), and distances in feet to inverters, substations, and panels and indicate whether each receptor is participating or non-participating in a separate column.

37. During the Site Visit, it was indicated that several residences/structures along Oak Grove Church Rd south of Area #12 will be relocated prior to Project construction. Provide a map and identify any existing residences or structures on participating parcels that will be removed or relocated to allow for Project construction. Identify if each relocated structure will be moved outside of the Project area.

38. As observed during the site visit, a narrow bridge in poor condition exists on R. Crump Rd, south of the indicated Access Point for Areas 15 & 16. Explain the plan for use of this bridge for access and deliveries given the observed condition and identify alternative delivery routes to Areas 15 & 16 during Project construction.

39. Provide details of any communications to date between Project representatives and representatives of the local Amish community, i.e., community elders. If none have occurred, indicate any plans for outreach prior to Project construction.

40. Refer to the public comment titled 20250728_Margie Dawsey Public Comment.pdf filed on July 29, 2025. Provide a response to the commentors' assertions that the Project will negatively impact the local Amish community, including their ability to hunt for deer and the health of their lands.

41. Refer to the public comment titled 20250721Multiple Public Comments.pdf filed on July 21, 2025, pages 63-64 and public comment titled 20250724_Response E-Mail to Gwynne Aidala.pdf, filed July 24, 2025. Provide a response to the commentors' assertions that the Applicant has not adequately communicated about public opportunities to comment on the Project.

42. Provide details of any communications to date between Project representatives and representatives of the Woodlawn Church. If none have occurred, indicate any plans for outreach prior to Project construction.

43. Provide the total number of gates in the perimeter fencing surrounding the module clusters and explain how each gate in the perimeter fencing will be secured.



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 **AUG 13 2025**

cc: Parties of Record

*Gregory T Dutton
Frost Brown Todd, LLC
400 West Market Street
32nd Floor
Louisville, KY 40202-3363

*Joye Beth Spinks
English, Lucas, Priest & Owsley
1101 College Street
P. O. BOX 770
Bowling Green, KY 42101

*Kathryn A Eckert
Frost Brown Todd, LLC
400 West Market Street
32nd Floor
Louisville, KY 40202-3363

*Honorable Harold Mac Johns
English, Lucas, Priest & Owsley, LLP
12 Public Square
P.O. Box 746
Elkton, KY 42220

*Pierce T. Stevenson
Frost, Brown, Todd, LLC
250 West Main Street
Suite 2800
Lexington, KY 40507