

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF GLOVER CREEK SOLAR,)	
LLC FOR A CONSTRUCTION CERTIFICATE)	
TO CONSTRUCT AN APPROXIMATELY 55)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR)	2020-00043
GENERATING FACILITY IN METCALFE)	
COUNTY, KENTUCKY PURSUANT TO)	
KRS 278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
ON REHEARING TO GLOVER CREEK SOLAR, LLC

Glover Creek Solar, LLC (Glover Creek), pursuant to 807 KAR 5:001, is to file with the Siting Board an electronic version of the following information. The information requested herein is due on January 18, 2021. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Glover Creek should not file the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Responses that are required to be provided on electronic medium 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.

Glover Creek shall make timely amendment to any prior response if Glover 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 Glover Creek fails or refuses to furnish all or part of the requested information, Glover 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 filing a paper containing personal information, Glover 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 Glover Creek's Petition for Reconsideration and Clarification (Petition) at pages 2–3 regarding the need to minimize conditions and uncertainty in order to obtain a comprehensive construction bid package. Explain in more detail and with supporting information how the mitigation measures identified in the Petition would create barriers for merchant solar development in Kentucky, including the Glover Creek solar project.

2. Refer to the Petition at page 6.
 - a. Explain whether Glover Creek received any comments or any other public response regarding the size of the vegetative buffer to reduce noise levels.
 - b. Explain whether the Glover Creek developers have ever been required to plant vegetative buffers taller than three feet at the outset of a solar project to reduce visual and noise impacts.
 - c. Provide an explanation as to what would be considered an industry best practice as it relates to planting vegetative buffers to mitigate against noise and visual issues.
 - d. Explain whether Glover Creek will use a competitive bid process or some other process to procure the plants used in the vegetative buffer.
 - e. Provide a cost estimate of the difference in price between a three- and six-foot vegetative buffer, assuming that the buffer is located as marked in the site plan.
 - f. Assuming the vegetative buffer is located as marked in the site plan and three- and six-foot trees were alternately planted in the buffer:
 - (1) Provide an estimate of the potential visual and noise reduction impact.
 - (2) State whether the alternate buffer configuration would satisfy acceptable noise parameters.
 - (3) Provide a cost estimate of the alternate buffer configuration.

g. Confirm the planting of a 15-foot-wide vegetative buffer in the locations marked on the preliminary site plan filed in this matter by Glover Creek would address all known and identified visual and noise impacts from the solar facility.

3. Refer to the Petition at page 7 regarding the temporary buffers suggested by Glover Creek. Provide additional information on the green slats and temporary canvas, such as a detailed description of each option, how each option would function, and the associated cost of installation and removal of each temporary option.

4. Refer to Glover Creek's Petition at page 9.

a. Provide additional information and support for the statement that "[s]cheduling all of the tamping near residences within 1,500 feet at the end of the tamping process will be inefficient and likely to cause increased costs, delays, or other unintended consequences during construction with uncertain benefit to the community."

b. Explain whether Glover Creek has investigated what time during the working day would be optimal for the tamping process to occur in order to mitigate as much noise impact as possible to nearby property owners.

5. Refer to Glover Creek's Petition at page 10.

a. Provide additional information and support for the claim that limiting the construction activity, process, and deliveries to the hours of 8 a.m. to 6 p.m. Monday through Saturday would place substantial restriction on Glover Creek's ability to meet operational and construction deadlines.

b. Based upon the Glover Creek developer's experience with similar projects, explain the nature of the activity that will take place between the hours of 6 p.m. and 9 p.m.

6. Refer to the Petition at page 14 regarding these statements: "If the standard is based on noise measured at the noise generator, it could severely impact the viability of solar projects in Kentucky, including the [Glover Creek] Project. Rather, it is more appropriate to have a standard based on the noise receptor and not the noise generator." Provide additional information and support for these two statements.



Linda C. Bridwell, PE
Executive Director
Public Service Commission *on behalf of*
the Kentucky State Board on Electric
Generation and Transmission Siting
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DATED JAN 04 2021

cc: Parties of Record

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