

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF AEUG)	
MADISON SOLAR, LLC FOR A CERTIFICATE)	
OF CONSTRUCTION FOR AN)	
APPROXIMATELY 100 MEGAWATT)	CASE NO.
MERCHANT ELECTRIC SOLAR)	2020-00219
GENERATING FACILITY IN MADISON)	
COUNTY, KENTUCKY PURSUANT TO)	
KRS 278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO AEUG MADISON SOLAR, LLC

AEUG Madison Solar, LLC (AEUG Madison), 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 March 2, 2021. The Siting Board directs AEUG Madison to the March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Siting Board. The Siting Board expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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.

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 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.

AEUG Madison shall make timely amendment to any prior response if AEUG Madison 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 AEUG Madison fails or refuses to furnish all or part of the requested information, AEUG Madison 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, AEUG Madison 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 AEUG Madison's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 2.c.
 - a. State with specificity how the project layout was updated to address the viewshed concerns that were conveyed by neighboring landowners and whether

these updates satisfied those landowners who expressed concerns with viewshed impacts.

b. Regarding those landowners that expressed concerns about the project's potential impact to property values, state how these landowners' concerns were addressed and whether the landowners were sufficiently satisfied with AEUG Madison's explanation. If any landowners were not sufficiently satisfied, state whether AEUG Madison has conducted any follow-up discussions or dialogue with these landowners.

2. Refer to Exhibit A, Preliminary Site Plan, attached to the AEUG Madison's responses to Siting Board Staff's First Request, and refer to the National Pipeline Mapping System (NPMS) at <https://www.npms.phmsa.dot.gov/>. Four natural gas transmission right-of-ways cross the project boundaries. There is one belonging to Columbia Gas Transmission (TCO E-KY line) that runs southeast to northwest through the project site in three places on its eastern side, but Exhibit A does not show this right-of-way, even though it may not interfere with the project's footprint. There are three pipeline right-of-ways that belong to Tennessee Gas Pipeline Company, owned by Kinder Morgan, that run west to east through the project. The most northern one is TGP 100 System 100-2, which pipeline according to NPMS is permanently abandoned. The right-of-way for TGP 100 System 100-4 is south of that, and TGP 800 System with two pipelines 800-1 and 800-2 is southernmost. Some of the project's internal roads in Exhibit A cross gas transmission pipeline right-of-ways.

a. State whether AEUG Madison has contacted Columbia Gas Transmission regarding its pipeline. According to NPMS the contact is Deborah Matthews, Manager, U.S. Integrity & Operations services, (304) 357-3171,

deborah_matthews@tcenergy.com, 1700 MacCorkle Avenue SE, Charleston, WV 25314. Describe all contacts with this company.

b. State whether AEUG Madison has a copy of the right-of-way easement for the Columbia Gas Transmission pipeline. If so, provide a copy of the easement.

c. State whether AEUG Madison has contacted Kinder Morgan/Tennessee Gas Pipeline Company regarding the described right-of-ways. According to NPMS the contact is the Public Awareness Coordinator, (800) 276-9927, PUBLICAWARENESS@KINDERMORGAN.COM, 1001 Louisiana Street Suite 1000, Houston, TX 77002. Describe all contacts with this company.

d. State whether AEUG Madison has a copy of the right-of-way easements for the Tennessee Gas Pipeline Company. If so, provide a copy of the easements.

e. For the abandoned pipeline, state whether Tennessee Gas Pipeline Company has abandoned the easement. State whether AEUG Madison is aware of any restrictions that apply to crossing this easement or building upon it.

f. State whether Kinder Morgan/Tennessee Gas Pipeline Company has any stipulations about the internal project roads and fences that will cross the pipeline. According to Exhibit A, the following internal roads cross their pipelines: (1) near Access #1 over 800-1 and 800-2 ROW, (2) from A12 to A11 over 100-4 ROW, and (3) from A16 north to B3 over 100-4 ROW twice. State whether there is a vehicular weight or frequency limit either from Kinder Morgan or the U.S. Department of Transportation's Pipeline and

Hazardous Materials Administration regarding use of any internal roads that will cross the pipeline.

g. Revise Exhibit A to clearly show the transmission pipeline right-of-ways, and label with the pipeline system name. Include the right-of-way for Columbia Gas.

3. The project footprint is in two electric service territories: Clark Energy Cooperative (Clark Energy) and Kentucky Utilities Company (KU). See the electric service area boundary on the web by following these instructions: Go to <https://kygeonet.ky.gov/govmaps/> and scroll down to “Featured Web Maps” and click on “Electric Service Areas”; fill in the project's street address in the space labeled “Find Address or place” and click on the search button; use the “–” button to zoom out to cover the area of the project site; change the base map to “Imagery Hybrid” under “Contents.”

a. State whether AEUG Madison has been in contact with these electric distribution utilities about supplying electric power to the site during the construction or operation phase. If so, please describe the interaction.

b. State whether the proposed solar facility will need to have electricity supplied to both electric territories during the construction or operation phase. State whether the electricity will be provided by both KU and Clark Energy to serve the proposed solar features that are located in their respective service territory.

c. State whether AEUG Madison intends to use one electric supplier and have the chosen utility file an electric territory boundary change with the Public Service Commission.

4. Refer to the questions propounded by Wells Consulting, which are attached as an Appendix to this information request, and provide responses to those questions.



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 FEB 23 2021

cc: Parties of Record

APPENDIX

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY STATE
BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING IN CASE
NO. 2020-00219 DATED FEB 23 2021

[TWELVE PAGES TO FOLLOW]

February 22, 2021



List of Questions for Data Request - II

AEUG Madison Solar, LLC
KY State Board on Electric Generation and
Transmission Siting

Customer:
Kentucky Public Service
Commission

Prepared for:
Quang D. Nguyen

February 22, 2021



List of Questions for Data Request - II

Prepared by:

A handwritten signature in black ink, appearing to read 'V. Chikkeruru'.

Vasu Chikkeruru, P.E.
Sr. Power Systems Engineer

Synopsis

This document is a list of questions prepared for the data (or) information to be requested as part of the application process for Solar Electric Generation Plant in Madison, KY.

Reviewed by:

A handwritten signature in blue ink, appearing to read 'Jim Cook'.

Jim Cook
Chief Operating Officer

WEpsc Order: WE200928193

Approved by:

A handwritten signature in blue ink, appearing to read 'Patrick A. Wells'.

Patrick Wells, P.E.
President/CEO

Public Service Commission PO:
PON2 123 2100001588

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REVISIONS

Revision	Date Issued	Issue Type	By	Description
0	02-18-2021	For Review	VC	Issue for Review & Record

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1 Introduction

The present document is a list of questions prepared for the request of data (or) additional information in the matter of Application of AEUG Madison Solar, LLC for a certificate of construction for an approximately 100MW Merchant Electric Solar Generation Facility in Madison County, KY pursuant to KRS 278.700 & 807 KAR 5:110

Scope

As part of the application evaluation process Kentucky Public Service Commission has appointed Wells Engineering PSC for providing consultancy services.

The present document is created as part of the Second request for information required as per the order issued for case number.2020-00219, by the commission.

Reference Document

The following documents are referenced for the creation of this document.

- i. Commonwealth of Kentucky Order for Case no. 2020-00219
- ii. Site Assessment Reports Vol.I, Vol.II and Vol.III for Case No. 2020-00219 by AEUG Madison Solar, LLC, KY
- iii. Kentucky Revised Statutes, KRS 278-706, 708, 710
- iv. Exhibit A – Updated site plan, ‘Madison Solar General Layout’ #C02245_P_AE_EN_LYT_CWS_980000001 Rev.1.9
- v. Madison Solar Single Line Diagram (Preliminary) #XXXX-DWG-HVS-101-000003 Rev.A
- vi. Responses to RFI-I, provided by AEUG Madison Solar LLC, Case No. 2020-00219

2 List of Questions

In this section a detailed list of questions is described.

Question#1

Electrical One-Line Diagram

Applicant to submit the missing Sheet 2 of the 'Single line diagram.'

Question#2

Overall Project Layout

On the layout diagram the power lines, indicated with the symbol  POWER LINES, are not identified, please indicate the transmission lines & internal power lines, and submit a revised plot plan as necessary.

This is required for assessing the radial clearances from the neighboring property structures.

Question#3

Overall Project Layout

On the layout diagram please locate the Plant and Utility substations.

Question#4

Overall Project Layout

Please provide the information on the utilities like Water, Sewer, etc, to be provided to the O&M building, Warehouse, Project offices and Power Stations.

This is required for assessing the capability of the proposed utilities.

Question#5

Overall Project Layout

Please locate and indicate the railroad on the layout, specifically for blocks A8, B3 & A16.



Question#6

Overall Project Layout

Please locate and indicate the public roads/streets like KY 388, Lost Fork Road, Bill Eades Road, etc, on the plot plan.

Question#7

Site Survey

Applicant to provide a site survey diagram/report, available if any.
This will be used to identify and locate the project legal boundary, with the help of reference points, monuments, etc.

Question#8

Access control

Applicant to provide information on the proposed physical and cyber access control applicable to site as per BES and CIP requirements defined by NERC, FERC & DHS.

Question#9

Good environmental history

Applicant to provide information on applicant's history of good environmental compliance as per KRS 278.710 (1) (i).

Question#10

Full time staff

Applicant to provide an approximate number of full-time employees working at site after construction is complete and the facility operational.



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