

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF UNBRIDLED)	
SOLAR, LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	
160 MEGAWATT MERCHANT ELECTRIC)	CASE NO.
SOLAR GENERATING FACILITY AND)	2020-00242
NONREGULATED ELECTRIC)	
TRANSMISSION LINE IN HENDERSON AND)	
WEBSTER COUNTIES, KENTUCKY)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
TO UNBRIDLED SOLAR, LLC

Unbridled Solar, LLC (Unbridled Solar), 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 February 2, 2021. The Siting Board directs Unbridled Solar 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 Siting Board 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.

Unbridled Solar shall make timely amendment to any prior response if Unbridled Solar 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 Unbridled Solar fails or refuses to furnish all or part of the requested information, Unbridled 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 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, Unbridled 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. Reference to Application, Exhibit F, page 1, under the heading "Compliance"

a. Provide detailed explanation of the transfer study on the injection of the Unbridled Solar output at the Reid Substation, and what is meant as a favorable interconnection.

b. Explain if the Feasibility and System Impact studies are the same Phase 1 study results projected to be completed in August 2021.

2. Identify where the entrances and exits to the construction site will be located.

a. State whether signage or traffic signals, or both, will be present near those entrances and exits, and if so, provide a description.

b. State how often traffic signaling is expected to be necessary to prevent any potential traffic issues.

3. Refer to the Application, Exhibit G, page 5.

a. Provide a detailed explanation of National Renewable Energy Laboratory's Jobs and Economic Development Impacts (JEDI) modeling methodology.

b. Explain why the JEDI methodology is particularly well suited for determining the economic impacts of various utility scale solar projects.

c. Explain how the model was calibrated to measure the impacts on Webster and Henderson counties.

4. Refer to the Application, Exhibit G, page 6.

a. Explain whether the Total Economic Output from the construction phase of the project is the long-term value derived over the life of the project.

b. Explain why the results in the operational phase can be construed to represent annual benefits while the construction phase results are not representative of annual benefits.

5. Refer to the Application, Exhibit G, page 9.

a. Explain whether Unbridled Solar knows of any particular large industrial or commercial customer that will serve as a buyer of its solar energy output.

b. Explain whether Unbridled Solar and its developers partners with utilities to market its energy output or is involved in economic development recruiting activities in the locations where it locates solar facilities.

6. Refer to the Application, Exhibit I, page 3, Table 1. State whether the 2016 land cover data obtained from the National Land Cover Database is the most current data.

7. Refer to the Application, Exhibit I, page 5, Section 2.2.1. – Facility Compatibility. Identify those property owners who expressed concerns with the viewshed; provide copies of the visual renderings as mentioned in this section; and provide copies of the screening plan agreements referenced in this section.

8. Refer to the Application, Exhibit I, page 10, Section 6.2, regarding proposed mitigation measures. With respect to the viewshed protection, state when Unbridled Solar expects to submit the request for approval of the vegetative buffer from the Henderson County Planning Commission and when a decision is anticipated to be received. Provide a copy of the submittal.

9. Refer to Application, Exhibit I, Attachment B, Section 3.1, Table 6. Provide any information available on the current traffic volume data by vehicle category (i.e., cars, trucks by weight class, etc.) for the roadways in the vicinity of the project area.

10. Refer to Application, Exhibit I, Attachment B, Section 6.2, Table 2 where it is stated that, as needed, commuting construction workers will be shuttled.

a. Identify the average number of worker commuter vehicles that are expected to drive to the project site each day during construction.

b. Identify the peak number of worker commuter vehicles that are expected to drive to the project site during construction.

11. Please indicate the hours of the day the workers will arrive and vacate the site during construction.

12. Please provide an approximate percentage breakdown of where the construction workers will commute from each day, if known.

13. a. Identify the types of trucks and other equipment by weight class that will access the site daily during construction.

b. Provide a breakdown of the traffic volume by truck category above on an average day and on a peak day.

14. Identify the expected maximum weight of the largest vehicles (including any materials or equipment that the truck is hauling).

15. Provide an approximate breakdown by point of origin for the construction truck traffic.

16. Identify where the construction crew, supervisors and others will park on-site.

17. Identify the protocol or frequency of spraying down compacted gravel roads associated with the project.

18. State whether Unbridled Solar has conducted any studies to indicate how much dust will be created during the construction phase or operational phase. If so, provide a copy of that study and characterize the level of dust impacts expected during construction and operation.

19. Refer to the Application, Exhibit J, part 1, Figure 1: Project Buffers Map. There does not appear to be any parks on the map. Confirm whether there are any public or private parks within two miles of the boundaries of the solar project site and the proposed transmission line. If this cannot be confirmed, provide a revised map which would include any public or private parks.

20. Refer to the Application, Exhibit K, Sheet Number UNB-L-900-01, Vegetative Screening Concept Plan.

a. Under General Notes, Pre-Construction, explain what is meant by “ALL PLANT MATERIALS AND INSTALLATION SHALL COMPLY WITH RECOMMENDATIONS AND REQUIREMENTS OF ANSI Z60.1 ‘AMERICAN STANDARD FOR NURSERY STOCK’.”

b. Provide the average height of the typical deciduous tree, evergreen tree, shrub, and multistem tree that will be planted five years after planting, at maturity, and provide when each of the typical deciduous tree, evergreen tree, shrub, and multistem tree will reach maturity.

21. The property for the proposed solar project is served by two electric distribution utilities: Kentucky Utilities Company (KU) in the northern part of the site and Kenergy for the majority of the acreage. See the 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 address “Handley Road, Robards, KY” in the space labeled “Find address or place” and click on the search button; use the – button to zoom out to cover most of the project site; change the base map to “Imagery Hybrid”. Under “Contents”:

a. State whether Unbridled Solar has been in contact with any of 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 Kenergy to serve the proposed solar features that are located in their respective service territory.

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

22. There is an interstate gas transmission pipeline that crosses the northern part of the project site. It is marked appropriately on the maps in Exhibit K, pages 2–4, as “EX-GAS”. This appears to be a high pressure gas transmission right of way owned by Texas Gas Transmission with two parallel 12- and 16-inch diameter pipelines as part of the Dixie Line. This information is available at the National Pipeline Mapping System at <https://www.npms.phmsa.dot.gov/>, along with the general contact, Thomas Porter, DOT Compliance Specialist, (713) 569-5730, Thomas.Porter@bwpipelines.com, 9 Greenway Plaza Suite 2800, Houston, TX 77046.

a. State whether Unbridled Solar has contacted Texas Gas Transmission regarding this pipeline. Describe all contacts with this company.

b. State whether Unbridled Solar has a copy of the right-of-way easement for the pipeline. If so, provide a copy of the easement.

c. The pipeline is close to the location of some of the solar panels. State how close to the pipelines heavy construction equipment, particularly pile drivers used to bore steel piers for the solar panels, can be used safely.

d. State whether Texas Gas Transmission has any stipulations about the two proposed site roads that will cross the pipeline. Also, state whether there is a vehicular weight or frequency limit recommended from Texas Gas Transmission or the U.S. Department of Transportation's Pipeline and Hazardous Materials Administration regarding the use of those site roads that will cross the pipeline.

23. Refer to the Application, Exhibit J, Figure 3: Property and Site Boundaries Map. State whether the parcel IDs listed in this figure are the same as the Parcel IDs used by the Henderson and Webster Property Valuation Administrators (PVA). If not, provide a revised map using the parcel IDs and parcel boundaries used by the Henderson and Webster PVAs.

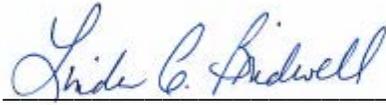
24. Refer to the Application, Exhibit D, which is the attachment that contains a redacted listing of the 63 landowners whose property borders the Unbridled Solar Facility site.

a. Confirm that the 63 landowners are the only landowners who own property that are adjacent the proposed solar facility site.

b. Provide a map and property owner key that identifies all neighboring parcels that is similar to the map and property owner key in Exhibit J, Figure 3: Property Owners and Property Owner Key.

c. Page 1 of Exhibit D states that the 63 landowners were notified by registered mail on November 10, 2020. Identify which of these landowners along with the Map Reference number and Parcel ID, if any, did not receive the registered mail that was sent on November 10, 2020. Also provide what efforts were subsequently made to notify any landowners that did not receive the November 10, 2020 letter.

25. Refer to the questions propounded by BBC 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 JAN 19 2021

cc: Parties of Record

Case No. 2020-00242

APPENDIX

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING IN CASE NO. 2020-00242 DATED JAN 19 2021

[THREE PAGES TO FOLLOW]

MEMORANDUM

To: Quang Nguyen, Kentucky Public Service Commission
From: Doug Jeavons
Re: Information requests for Unbridled Solar in regard to Site Assessment Report and Application
Date: January 13, 2021

- 1. Please provide a figure, similar to the figures in Exhibit J, which shows the boundaries of the 4 Star Industrial Park in relation to the boundaries of the proposed solar facility.**
- Section III. Solar Generating. 18 and 19. (pages 6 and 7 of the Application) states that Unbridled's site will be in compliance with the recently adopted Henderson County Zoning Ordinance Art. XXX related to solar facilities. It then notes that there are "two clusters of residences – one in Henderson County and one in Webster County" that could meet the definition of a residential neighborhood. Section 19 concludes with the statement that Unbridled will "file a separate request for any deviation needed from the 2000-foot setback requirement as to those two clusters of residences." **Please clarify that Unbridled would only be filing a request for a deviation from the Kentucky statutory setback requirements in Webster County, since the other "cluster" of residences is in Henderson County and falls under the relevant Henderson County Zoning Ordinance.**
- 3. Did Unbridled Solar or its related entities consult with or provide input to Henderson County in the development of the Henderson County Zoning Ordinance Article XXX, Solar Energy Systems (SES) adopted on 12/23/2019? If so, please describe Unbridled Solar's involvement.**
- Exhibit F of the Application (effect on Kentucky Electricity Transmission System) states that "a third-party consultant conducted a transfer study ... results of the transfer study indicated a favorable interconnection." **Please provide a copy of the transfer study.**
- In Exhibit G of the Application (the Economic Impact Analysis), Overview and Context section, one of the stated benefits of Unbridled Solar is a "commitment to the regional economy through charitable giving to local schools ..." **Please provide further detail regarding that commitment.**

6. Section 6 of Exhibit G describes “Government Revenue Impacts.” **Please provide Unbridled’s estimate of the change in taxable (assessed) property value that will occur from development of the proposed generating facility and transmission line.**
7. **Do the “Vegetation Screen(s)” shown in Exhibit J (Application Figures) all indicate new vegetation screening that will be planted by Unbridled Solar, or do they include existing vegetation screens?**
8. Page 2 of the Description of the Proposed Site (Section 1.2.1) refers to Attachment A, Figure 1 in regard to the location of residential structures, schools and public and private parks in relation to the generating facility. **Please confirm there are no schools or public or private parks within one mile of the proposed project.**
9. Page 2 of the Description of the Proposed Site (Section 1.2.1) refers to Attachment A, Figure 2 in regard to the location of residential structures, schools and public and private parks in relation to the transmission line. **Please confirm there are no schools or public or private parks within two miles of the proposed transmission line.**
10. Page 3 of the Description of the Proposed Site (article 2) indicates the legal boundaries of the proposed site are shown in the Exhibit K Application Plan Set. **Typically, generating facility applicants have provided legal descriptions of their proposed sites, but there are no legal descriptions in Exhibit K. Please provide.**
11. Page 3 of the Description of the Proposed Site (article 3) indicates the proposed facility access control is displayed in Exhibit K, Sheet UNB-E-500-03. That sheet shows the project boundary, but does not clearly indicate the access points. **Please provide a figure showing the proposed access points from public roadways.**
12. Page 3 of the Description of the Proposed Site (article 6) states that electric and water/sewer services will likely be required for the O&M building. **Please state which entities will provide these services.**
13. Page 3 of the Description of the Proposed Site (article 7) appears to be intended to respond to the setback requirements in Kentucky statute, but merely provides a map of surrounding residential structures. **Please consider incorporating some of the information provided in section 18-19 from the Application (pages 6 and 7) in this part of the SAR.**
14. Page 5, Section 2 of the SAR (compatibility with scenic surroundings), subsection 2.2.1 Facility Compatibility indicates that Unbridled Solar prepared visual renderings of the Project with the proposed screening plan and reviewed them with interested landowners. **Please provide these renderings.**
15. Attachment D, the Property Value Impact Report, is largely based on pair sales comparisons between “qualifying properties” adjacent to solar facilities and comparable

properties (also referred to as control area sales) “locationally removed from their influence.” (page 24). **Please provide the criteria used to select the comparable properties for purposes of these comparisons, particularly in terms of their locations relative to the qualifying properties.**

*Courtney Pelissero
Unbridled Solar, LLC
8400 Normandale Lake Blvd.
Suite 1200
Bloomington, MINNESOTA 55437

*Honorable Jason R Bentley
Attorney at Law
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KENTUCKY 40507

*Kathryn A Eckert
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KENTUCKY 40507

*Katherine Yunker
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KENTUCKY 40507

*Unbridled Solar, LLC
8400 Normandale Lake Blvd.
Suite 1200
Bloomington, MINNESOTA 55437