

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 SECOND 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 March 2, 2021. The Siting Board directs Unbridled Solar to the March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> 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.

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<sup>1</sup> 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. Refer to Unbridled Solar's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 10.b. State when the peak number of commuter worker vehicles will occur during the construction process and how long this peak commuting period is expected to last.

2. Refer to Unbridled Solar's response to Staff's First Request, Item 22.a. Provide an update to this response.

3. Refer to Unbridled Solar's response to Staff's First Request, Item 24.c. Regarding the second, third, and fourth letters that were identified as "still in transit," provide an update on the status of the delivery of these letters that were mailed again in January 2021.

4. Refer to Unbridled Solar's response to Staff's First Request, Item 24.c. with focus on the third letter. From the map UNB-E-502-02 in the Amended Exhibit K (Preliminary Site Plan), there appears to be a residential structure on the property. State whether or not the owner of this property received the letter mailed in January 2021. If not, describe any other attempts to contact the owner of this property.

5. Refer to Unbridled Solar's response to the questions propounded by BBC Consulting, Item 2.

a. Identify on the map shown in Amended Exhibit J, Figure 2.1 Project Layout Map Key, which is attached to Unbridled Solar's response to the questions propounded by BBC Consulting, Item 7, where the "two clusters of residences" as referenced in this response are located.

b. In addition to Figure 2.1, there are 16 maps provided in Amended Exhibit J, identified as Figures 2.2 to 2.17, which provided for a more focused view of the various sections of the entire layout of the entire Unbridled Solar project. Identify which of these more focused maps would contain the "two clusters of residences" and provide a revised map showing the location of these "two clusters of residences."

c. Provide in detail the facts relied upon by Unbridled Solar to determine that these “two clusters of residences” do not constitute a “residential neighborhood” as that term is defined in KRS 278.700(6).

6. Refer to Unbridled Solar’s response to the questions propounded by BBC Consulting, Item 5. Explain whether Unbridled Solar anticipates any other source of funding for the charitable fund other than from Unbridled Solar. If so, state how Unbridled Solar will attract these other funding sources.

7. Provide details on the safety protocols Unbridled Solar has in place for planned and unplanned outages that might occur on the utility’s circuit that the Unbridled Solar facility is connecting to.

8. Provide copies of the leases for the leased properties in Unbridled Solar’s response to Staff’s First Request, Amended Exhibit J. Label or index them with the property identifier number from the maps in Exhibit J.



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  
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DATED FEB 16 2021

cc: Parties of Record

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