COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF CALDWELL SOLAR, LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 200 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY IN CALDWELL COUNTY, KENTUCKY	))))))	CASE NO. 2020-00244

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

Caldwell Solar, LLC (Caldwell Solar), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on December 3, 2021. The Siting Board directs Caldwell Solar to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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 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 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

[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).

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.

Caldwell Solar shall make timely amendment to any prior response if Caldwell 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 Caldwell Solar fails or refuses to furnish all or part of the requested information, Caldwell 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Caldwell 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. Submit a copy of the lease agreements that Caldwell Solar has entered into in connection with the footprint for the proposed solar facility, including the lease agreements for each of the parcels of the participating landowner residences. To the extent that these leases will be provided under a petition for confidential treatment, provide the unredacted copies of each lease agreements under seal of confidentiality.

2. Detail any contracts by which Caldwell Solar has negotiated to pay, contracted to pay, or paid, any compensation, whether cash or otherwise, to non-participating landowners near the project. Include the terms of that agreement and which properties are involved in terms of distance to the project boundaries.

3. Detail the status of any applications for zoning changes or conditional use permits that are required for this project.

4. Detail the status of any litigation in state or federal court, or before an administrative agency other than the Siting Board involving this project.

5. Provide a description of any construction method that will suppress the noise generated during the pile driving process that Caldwell Solar plans to employ and the associated reduction in noise that each method produces.

a. Provide Caldwell Solar's planned level of construction using methods that suppress noise during the pile driving process.

b. Provide the estimated additional cost the use of noise suppression methods Caldwell Solar projects it will incur.

c. Provide a description of any additional construction noise mitigation measures Caldwell Solar considered implementing for the project; include the reason why it chose not to implement the additional noise mitigation measure.

6. Provide a table containing each non-participating residence within 500 feet of the pile driving activity. Include in the table the distance in feet from the pile driving and the anticipated Sound Pressure Level dBA at the non-participating residence.

7. Provide a table containing each project participating residence within 500 feet of the pile driving activity. Include in the table the distance in feet from the pile

driving and the anticipated Sound Pressure Level dBA at the project participating residence.

8. Provide the number of pile drivers that will be in use at the same time.

9. Provide a table listing each non-participating residence within 300 feet of an inverter. Include the distance to the inverter and the anticipated Sound Pressure Level dBA at the non-participating residence.

10. Provide a table listing the five closest non-participating residences to the substation. Include in the table the distance between the residence and the substation and the anticipated Sound Pressure Level dBA at the residence.

11. Refer to the Application, Exhibit F, pages 3 and 5. The chart on page 3 provides gross domestic product for Kentucky and the three counties. The scaling ratio discussed on page 5 is based on 2019 data. Provide an update to the chart on page 3 with 2020 or 2021 data where available.

12. Refer to the Application, Exhibit F, page 4.

a. Explain the estimated amount of the project capital investment.

b. Presumably, the level of capital expenditures in each of the relevant economic sectors in Kentucky was the starting point for the analysis. Provide a breakdown of the estimated capital expenditures by sector used in the Jobs and Economic Impact (JEDI) tool.

13. Refer to the Application, Exhibit F, page 5.

a. Explain the differences in the solar-power specific version of the JEDI tool vs. a more generalized version. In other words, explain how the JEDI model is

tailored to determine the economic impact of a region specific to the construction of solar-power facilities.

b. Explain generally how results obtained using the JEDI tool compares to a similar analysis using the IMPLAN model.

c. Explain whether there is sufficient data available for the three-county socioeconomic area of interest (SAOI) to run the JEDI tool at the regional level as opposed to the state level only and then scaling down to the regional level.

d. Given the proximity of the Regional SAOI to Missouri and Illinois, explain whether it is likely that a portion of labor will come from outside of the state.

14. Refer to the Application, Exhibit F, page 5, footnote 2.

a. Explain whether Caldwell Solar has provided estimates to the portion of specialized labor that would come from outside the Regional SAOI.

b. Explain any other assumptions necessary for this analysis.

15. Refer to the Application, Exhibit F, pages 5 and 7, Table 3. On page 5, it was explained that the scaling factor for the Regional SAOI was 0.0041; in the Table 3 footnote, it is states an adjustment factor of 0.0134 was applied. Confirm that the scaling factor used in this analysis is 0.0041.

16. Refer to the Application, Exhibit F, page 6, footnote 3. Provide the original estimate and explain how it changed based upon Caldwell Solar's revised anticipated employment data.

17. Refer to the Application, Exhibit F, pages 6 and 7. The economic impacts described on page 6 show approximately 161 direct jobs created during the construction phase and 361 jobs overall. On page 7, Table 3 shows estimates of approximately one

direct job and two jobs overall during the construction phase coming from Caldwell, Crittenden and Lyon counties.

a. Explain why it is reasonable to assume that the labor associated with land clearing, grading, basic construction, equipment operators, transportation, landscaping, security, essentially, all but the most highly skilled labor and management, would be drawn from outside the three county regional economy.

b. Describe the nature of the estimated five direct jobs that will be created during the operational phase.

c. Once the approximately 3,000-acre facility is complete and operational, explain why it is reasonable to assume that all estimated ten permanent jobs will come from outside the three county regional economy.

d. Refer to the Application, Exhibit C, page 6 of 83. Explain whether the "up to 7 full-time jobs" as stated in the letter to adjacent landowners will come from outside the three county region and reconcile the discrepancy between the model estimates of zero jobs in Table 3 and the "up to 7 full time jobs" stated in the letter to adjacent landowners.

e. Refer to the Application, Exhibit C, page 39 of 83. Explain whether the presentation made clear that the approximately 300 construction jobs created were forecast to come from outside the three county regional economy and reconcile the discrepancy between the model estimate of two jobs in Table 3 with the 300 jobs as stated in the presentation.

18. Refer to the Application, Exhibit F, page 7. Since there are zero regional economy jobs created during the operational phase of the project, explain the source of the total economic output.

19. Refer to the Application, Exhibit F, page 8.

a. Provide a list of material that will be purchased for the project broken out by taxable and tax exempt under Kentucky law.

b. Provide a breakdown of the $240,000 state and local annual tax revenue generated by tax type and if income taxes are not included, provide an estimate of the state income tax revenue.

c. Refer to Exhibit C, page 39 of 83. Explain whether the Education Fund is the same as the local charitable fund mentioned on Exhibit F, page 8 and, if so, provide the name of the fund.

20. Refer to the Application, Exhibit J, and explain the following involving isolated properties or "donut holes" completely within the Caldwell Project Boundary.

a. In Solar Array Site Plan CDW-E-502-07, near INV-60, furnish the name of the owner of the isolated property, describe what is on it, and how the owner will reach that property without a right-of-way to Old Fredonia Road.

b. In Solar Array Site Plan CDW-E-502-06, near INV-53, furnish the name of the property owner, describe what is on it, and how the owner will reach that property from the nearest public road.

21. There are three cemeteries (Craig Cemetery, Crider Cemetery, and Adams Cemetery) within 1,000 feet of the Project Boundary according to the Geographic Names Information System. Provide the location of each cemetery on a map showing the Project

Boundary and the nearest solar array. If any of these are located within the Project Boundary, describe how access will be provided. Provide the name and requested information about any other cemeteries within 1,000 feet.

22. Refer to the Application, Exhibit J, map legend. Explain which collector lines are underground and which ones are aboveground (overhead).

23. According to the Kentucky Geological Survey's data for karst, the entire area of the Caldwell Project is classified as "intense" karst. There are a number of sinkholes, particularly in the central area of the site. Looking at Exhibit J, some of these sinkholes have been avoided for solar panels, but they are labelled in the legend as wetlands. Confirm whether the project hired a geologist to identify the karst features, such as sink holes, sinking creeks, open throats, etc.

24. Explain in detail the setback that will be applied to sink holes.

25. Refer to the Application, Exhibit G, regarding the Caldwell Solar Facility Cumulative Environmental Assessment, please provide information on the following:

a. Details of any contact with the Caldwell County Water District regarding water use.

b. Details of any known water wells on site that will be used for construction and operation.

c. Details of any sewer lines in or near the project site.

d. Confirm that Caldwell County water lines appear to intersect the site along Pleasant Valley Road, Old Fredonia Road, Skinframe Creek Road, Bobby Fill Road, and Craig Cemetery Road; and run parallel to the site boundary along Adamson Road, Crider Spur Road, Old Fredonia Road, Skinframe Creek Road, and Marion Road.

26. According to the Site Assessment Report, Exhibit H, Caldwell Solar will connect to the transmission system of Big Rivers Electric Corporation. Explain whether the project will require the use of the electric distribution system during construction or operation.

27. Provide details of any contact with Kentucky Utilities, which is the distribution utility designated to serve the area of the project site.

28. Refer to the Application, Exhibit C, which includes meeting materials that state generally, "construction typically takes 12-18 months." Explain how long construction of the Caldwell Solar Project specifically will take, in total number of months.

a. Provide a detailed description of construction activities, including a construction timeline and schedule by activity.

b. Explain whether construction activities will occur sequentially, or concurrently across the Project site.

c. Explain whether construction activities will include different activities taking place in different areas of the Project site at the same time.

d. State when the peak construction activity period will occur (which month or quarter of the full construction period).

e. State how long the peak period will last, in weeks or months.

f. Provide the average number of construction workers on-site.

g. Provide the number of construction workers on-site during the peak period.

h. Provide the number of construction workers on-site, by quarter, over the entire construction period.

i. Describe any special construction activities or personnel required to connect the Project to the existing transmission line.

29. State the number of construction entrances to the Project site. Provide text descriptions and a map illustrating the location of all construction entrances to the Project site.

a. State the number of operational entrances to the Project site. Provide text descriptions and map illustrating the location of all operational entrances to the Project site.

b. Refer to the Application, Exhibit H, Section 1, Description of Proposed Site, which states that 18.46 miles of graveled access roads will be installed. Explain whether those 18.46 miles are in addition to the ten miles of access roads referred to in Exhibit B.

c. Confirm or correct our understanding that the security fencing will be a transparent, chain-link fence.

d. Refer to the Application, Exhibit J, confirm or correct our understanding that fencing will be located immediately adjacent to the solar panels and not along the Project boundary line.

e. Refer to the Application, Exhibit J, figure legends. Confirm or correct whether the 1,324 acres listed as Site Fence (acres) is the total number of acres of the Project site within the security fencing.

f. Explain whether the switchyard will be included within the fenced area enclosing the substation, or whether it will have its own separate security fencing.

g. Confirm or correct our understanding that the substation will be enclosed with a seven-foot high chain link fence and that other areas of the Project site will be enclosed with a six-foot high security fence.

h. Other than fencing, explain any additional security measures in place during construction.

i. Other than fencing, explain any additional security measures in place during operations.

j. Confirm or correct our understanding that all entrances to the project site will be gated and locked at all times when workers are not on-site.

k. Explain how Caldwell Solar staff will coordinate security with local law enforcement agencies.

30. Provide the estimated number of separate laydown yards expected to be located within the Project site.

a. Refer to the Application, Exhibit B which states that the locations of the laydown yards have not been finalized. Explain whether those laydown yards are likely to be located at or near the site entrances.

b. Clarify whether the laydown yards will be gravel.

c. Explain whether the laydown yards will have their own separate or additional security fencing.

d. Explain whether laydown yards located in permanently unbuilt areas within the Project boundary will be returned to their original conditions once construction is complete.

31. Provide a detailed table listing all residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:

a. The distance to the boundary line.

b. The distance to the closest solar panel.

c. The distance to the nearest inverter skid.

d. The distance to the substation.

32. Provide a detailed table listing all non-residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:

a. A description of the structure (barn, commercial building, warehouse, church, etc.).

b. The distance to the boundary line.

c. The distance to the closest solar panel.

d. The distance to the nearest inverter skid.

e. The distance to the substation.

33. Refer to the Application, Exhibit J, figure legends:

a. Confirm or correct our understanding that 541,752 solar panels will be installed on the Project site.

b. Confirm or correct our understanding that the Project is anticipated to require 65 inverter skids/pads and an associated 265 inverters installed on the Project site.

c. State the number of inverter pads with three inverters, the number of pads with four inverters, the number of pads with five inverters and the number of pads with six inverters.

d. Confirm or correct our understanding that the Project is anticipated to require 65 transformers to be installed on the Project site–on the 65-inverter skids.

e. Confirm or correct our understanding that the Project is anticipated to require 76 overhead poles to be installed on the Project site and that those poles will be up to 70 feet in height.

f. Clarify whether all the overhead poles will be located with the Overhead Collection Corridor.

34. Refer to the Application, Exhibit I, Figure 3 and Figure 3 Key. Confirm or correct our understanding that there are 18 separate parcels included in the Project boundary.

35. Refer to the Application, Exhibit I, Figure 3 Lease Property Owner Key. Confirm or correct our understanding that Caldwell Solar has six separate lease agreements with property owners and that those six lease agreements cover all 18 parcels included within the Project site.

36. Refer to the Application, Exhibit I, Figures 2.7 through 2.9.

a. Confirm or correct our understanding that there are five small areas within the larger 18-parcel area that will be "excluded" from the Project site.

b. Explain whether those are portions of participating landowner parcels vs. non-participating landowners.

c. In Figure 2.7, clarify whether there are any structures within the excluded area in this Figure.

d. If so, indicate the type of the structure and whether it is habitable.

e. If so, provide the distance any structures and each type of Project infrastructure, including panels, inverter skids, overhead collector lines, and substation.

f. In Figure 2.8, two excluded areas are indicated to include residential structures. State the type of structure and whether these are habitable. Clarify whether those residences are owned by participating property owners. Provide the distance between those residences and each type of Project infrastructure, including panels, inverter skids, overhead collector lines, and substation.

g. Describe any structures included in the third excluded area in Figure 2.8. If applicable, state the type of use and whether or not they are habitable. Provide the distance between any structures and each type of Project infrastructure, including panels, inverter skids, overhead collector lines, and substation.

h. In Figure 2.9, clarify whether there are any structures within the excluded area in this Figure. If so, state the type of structure(s) and whether these are habitable.

i. If so, provide the distance between any structures and each type of Project infrastructure, including panels, inverter skids, overhead collector lines, and substation.

37. Refer to the Application, Exhibit B, which states that the locations of the weather stations will be determined following final engineering. Explain whether those stations are likely to be located within the interior of the Project site, or closer to the Project boundary line.

38. Clarify whether any existing structures on the Project site will be demolished or removed in order to accommodate the Project.

39. Described any utilities (water, wastewater, electrical, or other) that will be required during construction or operations and what organization will provide those services.

40. Refer to Caldwell Solar's Motion for Deviation from Setback Requirements. The document poses the question of whether the two identified residential areas meet the statutory definition of a "residential neighborhood" and therefore requests "two alternative forms of relief": (1) an approval of a deviation from the setback requirements or (2) a determination that no deviation is necessary.

a. Explain what the justification for requesting such a deviation, i.e. loss of generation capacity, cost, etc.

b. Explain whether the solar panels and other structures could be re-configured within the site boundaries to meet the setback requirements.

c. State the distance between the White Sulphur Church, located on West White Sulphur Road north of Old Fredonia Road, and:

(1) The closest portion of the Project boundary.

(2) The closest Project facility or facilities (a panel, an inverter, etc.).

d. Confirm or correct our understanding that the Project will have a minimum 200-foot setback to all residential properties.

41. Provide the current property values of each property adjacent to the Project site.

42. Provide property values of raw land or residential structure values per constructed square foot of developed property in Caldwell County in the vicinity of the Project site.

43. Provide a table listing each property adjacent to the Project site, including:

a. Distance between the home and the Project boundary, if applicable.

b. Distance between the home and the closes solar panel, if applicable.

c. Land use classification (i.e., residential, commercial, agricultural, industrial, etc.).

44. Provide a map that identifies each adjacent property, as associated with the list requested above.

45. Explain whether the Lafarge Quarry north of the Project site is currently operational and in production.

a. If so, describe the activities that occur at that location, including how the production is exported off from the quarry (i.e., rail or truck).

b. Please provide the average daily truck traffic from the quarry.

c. Explain whether the quarry is anticipated to remain in operation for the foreseeable future.

46. Refer to the Application, Exhibit H, Attachment D, Property Value Impact Study.

a. Explain the potential for impacts to local property values during the construction phase.

b. Explain any effects of vegetative buffering on values of properties in proximity to a solar project, generally.

47. Refer to the Application, Exhibit H, Attachment D, page 18, Scope of Work. Explain the statement "The methodology employed in this report for paired sale analysis does not rely on multiple subjective adjustments that are typical in many appraisals and single-paired analyses. Rather, the methodology remains objective and the only adjustment is for market conditions."

48. Refer to the Application, Exhibit H, Attachment D, page 111, the summary table.

a. This table appears to suggest that, for the ten solar farm Test Area vs. Control Area properties selected for comparison, the property values go up the closer the residences are to the solar panels. Please explain if that interpretation is correct. If so, explain why that would happen.

b. Clarify whether the same conclusions can be made in cases where homes are closer to panels than indicated in this table.

c. Clarify whether the same conclusions can be made in cases where a solar project may be larger in size (MW or acreage) than those indicated in this table.

d. Explain the applicability of the conclusions to the Caldwell Solar Project, which is 200 MW and covers an area of about 3,000 acres.

e. Explain how the data set was chosen and whether these conclusions would differ if a larger dataset of solar farm studies was included in the analysis.

f. Explain the extent of vegetative buffering that occurred near Control Area properties for the chosen Solar Farms.

49. Refer to the Application, Exhibit H, Section 1 Description of Proposed Site, which states that the Project may use railways for construction deliveries.

a. State whether the Fredonia Valley Railroad (FVRR) or the Paducah and Louisville Railroad (PAL), or both would be used for construction deliveries.

(1) If yes, describe the materials or equipment that might be delivered via railway.

(2) Explain whether any discussions have been had with railroad representatives regarding potential use or deliveries. If so, describe those discussions and any outcomes.

b. Explain whether construction vehicles or large trucks will need to cross over the FVRR or PAL to access the Project site during construction.

c. If so, explain whether Caldwell Solar will need to acquire a crossing agreement with FVRR, Lafarge, PAL, or other entities.

50. Refer to the Application, Exhibit H, Attachment F Traffic Study.

a. The Traffic Study states that deliveries by overweight or oversized trucks are not anticipated. Clarify whether that assumes that the railway is used for large deliveries.

b. If the railroad is not used, describe the delivery route for large, heavy equipment such as the main power transformers.

c. Provide additional baseline traffic data for local roads adjacent to and within the Project site, including, but not limited to, Old Fredonia Road, Pleasant Valley Road, Skinframe Creek Road, and Fredonia Quarry Road.

d. Provide the average daily number of construction vehicles accessing the site, by vehicle type, i.e., worker vehicles, delivery trucks and water trucks (if utilized).

e. Provide the peak daily number of construction vehicles accessing the Project site, by vehicle type, i.e., worker vehicles, deliver trucks and water trucks, if utilized.

f. Provide the assumption of the number of workers per vehicle traveling to the Project site.

g. Provide the maximum expected weights for each type of delivery truck or water trucks, if utilized.

h. Identify and describe the anticipated routes to be used by workers and delivery trucks during construction.

i. State which roads will be utilized to access the Project site.

j. Explain how many commuter vehicles will use each road on average during the construction period.

k. Explain how many commuter vehicles will use each road during the peak construction period.

l. Explain how many delivery trucks or other large trucks will use each road on average during the construction period.

m. Explain how many delivery trucks or other large trucks will use each road during the peak construction period.

51. For all local roads to be utilized by workers and/or delivery trucks, provide:

a. A description of each of those roads (i.e., width, shoulder, markings, paved, or dirt, etc.).

b. The conditions of those roads and explain whether they are adequate to handle additional traffic, especially large trucks.

52. Explain whether water trucks will be required to deliver water to the Project site during construction. If so, provide the number of water trucks accessing the site on (1) average and (2) during the peak period.

53. Explain any specific traffic management strategies to be employed during construction.

54. Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries. If yes, provide the expected locations, frequency and length of those stoppages.

a. Explain whether contact has been made with the Caldwell County Road Department to discuss potential traffic issues, traffic management, road degradation or other concerns. If yes, describe the nature of those conversations and any outcomes.

b. Explain whether construction vehicles will be required to cross any bridges to access the Project site.

(1) If yes, identify each bridge location on a map.

(2) If yes, state the weight limit for each bridge utilized.

55. Explain how fugitive dust will be managed during the construction period.

56. If applicable, describe odor impacts from diesel fumes or other sources from construction vehicles that may be noticeable to nearby residents.

57. During operations indicate whether the Project site will be irrigated to promote vegetation growth and reduce potential erosion.

58. Describe the types of activities occurring in the vicinity of the Project that generate ambient noise in the area.

59. Identify the ambient noise levels in different locations surrounding the Project site.

60. Explain current FVRR railroad operations and the contribution to ambient noise levels.

61. Describe the types of noise-producing construction activities and equipment that will take place during construction phase.

62. Provide a table indicating the noise produced by each piece of construction equipment at distances of (1) 10 feet, (2) 50 feet, (3) 100 feet, and (4) 300 feet.

63. Describe the equipment and process/construction methods used to develop the underground cabling.

64. Describe the equipment and process/construction methods used to develop the overhead collection system. Explain whether pile driving will be required for installation of the overhead poles.

65. Explain whether any restrictions will be placed on the time of day or days of the week during which pile driving or other loud construction activities may take place.

66. State the number of days or weeks over which pile driving activities will occur.

67. State whether any other loud construction activities, such as trenching, will occur simultaneously with pile driving.

68. Describe any specific measures to be taken to reduce noise impacts for nearby residents during construction.

69. Provide a table listing each noise receptor within 2,000 feet of the Project boundary. For each receptor, provide:

a. An indication of the type of structure-residential, commercial structure, school, church, barn, or other.

b. The distance from the Project boundary.

c. Estimated construction noise level, in dBA, at that location on an average day and the duration of construction noise at that location, in number of days.

d. Estimated construction noise level at that location on a peak day, in dBA, and the duration of peak construction noise at that location, in number of days.

70. Refer to the Application, Exhibit H, Attachment B Noise Assessment)

a. Confirm or correct our understanding that the small red dots illustrated on Plot 1 and Plot 2 are the proposed locations of the inverter skids.

b. If the above assumption is correct, confirm that the noise assessment accounts for multiple inverters (three to six) and a single transformer at each skid location.

c. Explain the purple circles located immediately around each red dot illustrated on Plot 1 and Plot 2.

d. Explain the red circles located outside of the purple circles on Plot 1 and Plot 2.

e. Explain the distance required to reach the orange 45 dBA contour from each inverter skid, as shown in Plot 1 and Plot 2.

f. Explain whether that distance varies according to the number of inverters per inverter skid.

g. Describe the noise levels generated by a three-inverter skid, a four-inverter skid, a five-inverter skid, and a six-inverter skid.

h. Confirm or correct our understanding that the 45 dBA contours shown in Plot 1 and Plot 2 represent the maximum distance to a 45 dBA contour, given the inverters and transformers anticipated for each skid.

71. During construction explain whether any existing vegetation will be removed to accommodate Project infrastructure (panels, weather stations, buildings, etc.).

72. Refer to the Application, Exhibit I, Figures 2.2 through 2.9.

a. Provide an explanation of the specific criteria or other factors used to determine the locations and extent of the proposed vegetative screening/buffering along different areas of the Project boundary.

b. Explain the criteria used to determine the areas where existing vegetation is enough to screen the Project (blue lines).

c. Explain how elevation (i.e. hills and valleys) was factored in when evaluating visual impacts and the need for buffers.

d. State the number of years it will take for planted trees to reach mature height.

e. State the number of years it will take for planted shrubs to reach mature height.

f. Describe any other forms of visual barrier to be implemented between the time of vegetation planting and the time when trees and shrubs will reach mature height.

g. Describe the plan for maintain the planted vegetation and replacing dead trees or shrubs throughout the operational period.

h. Provide any computer-generated images portraying the solar panels, security fencing and newly planted trees and shrubs, if available.

i. Provide any computer-generated images portraying the solar panels, security fencing and mature trees and shrubs, if available.

j. State whether any acres of native pollinator-friendly plant species will be planted within the Project site to replace lost cropping activity.

k. Confirm or correct our understanding that no visual barriers will be developed or constructed to shield the overhead poles from view.

l. Confirm or correct our understanding that the overhead poles will be in view from some residences.

m. Provide the distance between the overhead poles and the closest individual residence.

n. Provide the distance between the overhead poles and the closest residential neighborhood.

73. Refer to the Application, Exhibit H, Attachment C, Glare Report.

a. Confirm or correct our understanding that the report only addresses the potential for glare along specific analyzed portions of Route 91, route 641, and I-69.

b. Explain how or why the analyzed portions of Route 91, Route 641, and I-69 were selected for analysis.

c. Refer to Figure 3. Confirm or correct our understanding that the numbers located along each of the analyzed routes indicate different locations evaluated for glare.

d. Refer to Figure 3. Explain the numbers surrounding the Project boundary.

e. Describe the potential for different types of glare to affect residences adjacent to or nearby the Project boundaries.

f. State the number of minutes of different types of glare potentially affecting residences adjacent to or nearby the Project boundaries in different locations.

74. Provide any additional documents, maps, graphics, or other materials that have been presented to the community or other groups as part of outreach efforts, if not previously included in the Application, Exhibit C Public Notice Evidence and Report.

75. Provide any available transcripts of the public meetings. Provide any written or oral comments offered by the public or government agencies.

76. Describe the specific issues or concerns brought up by the public others as the result of public meetings or though other avenues.

77. Describe any specific issues or concerns brought up by representatives of the White Sulphur Church. Explain whether the church has been contacted specifically to discuss the Project.

78. Explain any plans to coordinate with local landowners or others in case of complaints or other issues that might arise during the course of construction or operations.

79. Refer to the Application, Exhibit G Environmental Permits, which lists other permits that either have been or will be obtained prior to construction or operations. Provide copies of any submittals to those agencies, other than materials already provided, that address any of the specific topics addressed in this inquiry.

80. Refer to Application, Exhibit F, Section 2 Capital Investment.

a. Public meeting materials included in Exhibit C state capital investment of $317 million. Confirm or correct that estimate.

b. Explain what types of materials, supplies, or equipment would be purchased within Kentucky in support of Project construction.

c. Explain what types of materials, supplies, or equipment would be purchased within the regional SAOI (Caldwell, Crittenden, and Lyon counties) in support of Project construction.

81. Refer to the Application, Exhibit F Section 4 Economic Impacts: Statewide. Explain the discrepancy between Section 4 and the public meeting materials, and confirm the more accurate source.

82. Confirm or correct our understanding that 160.6 construction jobs will be generated by Project construction. In comparison, public meeting materials provide in Exhibit C state "300 construction jobs created."

83. Clarify whether the 160.6 jobs generated during the construction phase are FTEs and whether the jobs noted in this section are expected to be filled by residents of Kentucky.

84. Clarify whether additional construction jobs will be generated by the Project, but filled by out of state residents.

85. Confirm or correct our understanding that average earnings per construction employee is about $69,350 over the entire construction period.

86. Confirm or correct our understanding that total Project construction-related spending on materials, supplies, and other items in Kentucky would amount to

approximately $6.4 million, and that total Project construction-related spending in Kentucky would be $17.5 million, including labor income.

87. Confirm or correct our understanding that the five operational employees would be required for the Project. In comparison, public meeting materials included in Exhibit C state seven full time jobs would be created by Project operations. Explain the discrepancy.

88. Confirm or correct our understanding that each operational employee would earn an average annual salary of $60,000 each. In comparison, public meeting materials included in Exhibit C suggest that each operational employee would earn an annual salary of $70,000.

89. Describe the types of operational activities that will occur after the facility goes on-line.

90. Confirm or correct our understanding that Table 2 indicates that operational expenditures consist solely of labor income, and that no additional spending is anticipated as associated with Project operations (estimates of earnings and total economic output are the same). If that is not correct, provide the average annual dollar amount and explain what types of items (materials, supplies, equipment, etc.) would be purchased in support of facility operations.

91. Refer to the Application, Exhibit F, Section 5 Economic Impacts: Regional. Section 3 explains the methodologies used to determine regional impacts. That methodology appears to result in a conclusion that less than one direct construction job will be generated by the Project in the local area and no operational jobs (although it is noted in the text that the five operational jobs are likely to be filled by local individuals).

Provide a revised estimate of the number of construction jobs, and associated earnings, potentially filled by local residents.

92. Explain what types of items (materials, supplies, equipment, etc.) would be purchased from within the regional SAOI in support of facility operations.

93. Explain the $1,024 noted as Value of Earnings and Total Economic Output under Operations in Table 3, given that there are no local jobs associated with that amount of money.

94. Explain whether Caldwell County or the regional SAOI will experience any economic losses related to agricultural acreage going out of production with the Project is operational.

95. Confirm or correct the estimate of $240,000 in annual tax revenues associated with state and local taxes. In comparison, public meeting materials included in Exhibit C state the annual tax revenues would be $265,000 per year. Clarify the discrepancy. Further:

a. Provide the amount of annual property tax revenues generated for Kentucky from the Project.

b. Provide the total property tax revenues generated for Kentucky from the Project over the 20-year operational period (or revised operational period).

c. Provide the amount of annual property tax revenues generated for Caldwell County from the Project.

d. Provide the total property tax revenues generated for Caldwell County from the Project over the 20-year operational period (or revised operational period).

e. Provide the distribution of annual Caldwell County property tax revenues from the Project to applicable local entities, including school districts.

f. Provide the amount of annual property tax revenues generated for any other counties from the Project inasmuch as public meeting materials provided in Exhibit C state that "local counties" will receive tax dollars.

g. Explain the "approximately $800,000 to a local charitable fund over twenty years."

(1) Explain how that fund will be formed.

(2) Please confirm or correct whether Caldwell Solar's contributions will be a constant $40,000 per year.

(3) Explain how that fund will be governed or controlled.

96. Confirm or correct our understanding that the expected life of the Project is approximately 20 years, as indicated in the Economic Report. In comparison, public meeting materials included in Exhibit C provide data on economic benefits for a 25-year operational period. Explain the discrepancy.

97. Explain the relatively short life of the Project, assuming an expected 20-year operational period is correct.

98. Explain any commitments regarding land restoration included in the landowner lease agreements.

99. Explain whether there are any other solar projects proposed for location in Caldwell County and currently undergoing review by the Siting Board.

a. If so, describe the location and size of those projects.

b. If so, explain their location relative to this Project.

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 NOV 19 2021

cc: Parties of Record

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