

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF MANTLE ROCK	)	
SOLAR, LLC FOR A CERTIFICATE OF	)	
CONSTRUCTION FOR AN APPROXIMATELY 42-	)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR	)	2024-00050
GENERATING FACILITY IN LIVINGSTON	)	
COUNTY, KENTUCKY PURSUANT TO	)	
KRS 278.700 AND 807 KAR 5:110	)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO MANTLE ROCK SOLAR, LLC

Mantle Rock Solar, LLC (Mantle Rock), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 26, 2025. The Siting Board directs Mantle Rock to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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 the 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.

Mantle Rock shall make timely amendment to any prior response if Mantle Rock obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Mantle Rock fails or refuses to furnish all or part of the requested information, Mantle Rock shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied or scanned 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, Mantle Rock 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 the Site Assessment Report (SAR), Attachment A, Facility Equipment, 3. Conceptual Layout. Explain whether the nine power conversion systems (PCS) identified in the design specifications are separate inverters, and when each augmentation PCS will be added for the future battery energy storage system (BESS) units.

2. Refer to the SAR, Appendix G, Noise Analysis, pages 13-15. State whether the estimated noise generated by the BESS is inclusive of noise generated by the PCS. If not, provide a revised Table 6 with the “Battery” column updated for the cumulative sound levels from operation of both the BESS units and PCS at each receptor.

3. Refer to the SAR, Appendix G, Noise Analysis, pages 10-12. Explain the basis for the statement that solar pile drivers are quieter than other pile drivers.

4. Refer to the SAR, Appendix G, Noise Analysis, pages 10-12.

a. State whether the estimate of 84 dBA at 50 feet for pile driving is for the specific pile driver to be used on this project (Vermeer PD10).

b. Provide supporting documentation for this estimate from within the last five years, such as the manufacturer’s specification sheet including sound output.

c. Provide a revised Table 5 with the “Pile Driving” column updated for each receptor.

5. Refer to Mantle Rock’s response to Siting Board Staff’s First Request for Information (Staff’s First Request), Item 53 which states that the Applicant is preparing revised estimated sound levels based on newer information on equipment for supplemental response. Provide those revised sound levels.

6. Provide a noise contour map for the 2,000-foot area surrounding Project boundaries during Project operations, accounting for all Project components and noise receptors.

7. Refer to Staff’s First Request, Item 62, which states that the Applicant is preparing a revised traffic impact report for supplemental response. Provide that report.

8. Refer to the SAR, Section 6 (Mitigation Measures), Item #33. Provide details describing the Complaint Resolution Program, including how the Applicant will coordinate with local landowners or others in case of complaints or other issues that might arise during the course of construction or operations. If no details are available, provide a copy of a Complaint Resolution Program the Applicant has instituted for a similar solar project.

9. Provide a list of all permits required from other local, state or federal agencies for the construction and operation of the Project, indicating the specific agency, permit type and applicability to the Project.

10. Provide any materials submitted to other permitting agencies related to this Project.

11. Refer to Mantle Rock's response to Staff's First Request, Item 122, which states that the Applicant is preparing a visibility analysis for supplemental response. Provide that Visibility Analysis.

12. Refer to the Revised Economic Analysis, Attachment to Staff's First Request, Item 108. Reconcile the 156 direct construction jobs listed on page 7 and \$5.954 million in construction labor on page 9 stated in the text with the 100.8 direct jobs and \$9.9 million in direct labor income in Table 5 on page 10. Include in the response a revised Table 5, as necessary.

13. Refer to the Revised Economic Analysis, Attachment to Staff's First Request, Item 108. Provide an estimate of the direct labor income associated with the "1.3 direct permanent operational jobs at the site."

14. Refer to the Revised Economic Analysis, Attachment to Staff's First Request, Item 108. Farming data in the table reflects direct impacts only, while solar operations and lease payment data reflect total impacts. Provide a revised table including the total impacts for farming.

15. Refer to the SAR, Appendix E, Landscape Plan. Explain the difference between "standard" screening and "heavy" screening.

16. Refer to the SAR, Appendix E, Landscape Plan. The text on page 2 of the Plan seems to refer to a one-year warranty period for planted vegetation on the part of the landscape contractor. Explain whether Mantle Rock will monitor, replace, or supplement plantings, as necessary, over a longer period of time than one year.

17. Refer to the SAR, Appendix E, Landscape Plan.

a. Confirm that Mantle Rock will be responsible for maintaining the pollinator meadow throughout the life of the Project. If not confirmed, explain who will be responsible for the maintenance activities.

b. Explain what would be included as part of maintenance activities.

18. Refer to Mantle Rock's response to Staff's First Request Item, 8.

a. Explain the specific activities that might take place between 6 a.m. and 7 a.m. and between 7 p.m. and 10 p.m. Monday thru Saturday and on Sundays, given the statement that construction activity would be limited to 7 a.m. and 7 p.m. Monday through Saturday.

b. State whether mowing activity will be limited to the hours of 8 a.m. and 5 p.m. Monday through Friday.

19. Refer to Mantle Rock's response to Staff's First Request Item, 27. During the Site Visit, the Applicant indicated that the Laydown area on the western side of Carrsville Road will be enclosed within the Project's perimeter fencing.

a. Provide a revised Preliminary Site Layout Plan which depicts this change.

b. Explain how this change in layout would impact the pollinator meadow planned for that area.

c. Provide a revised total length for the perimeter fencing with this change incorporated.

20. Refer to Mantle Rock's response to Staff's First Request Item, 27, Attachment 1-27 labeled "Figure 1: Residential Structures for the Mantle Rock Solar Project". Refer also to the site layout plan provided at the site visit, attached as an Appendix to this request for information. The two references do not match the revised site layout plan provided during the site visit. Additionally, Attachment 1-27 does not include the components referred to in Mantle Rock's Response to Staff's First Request Item 34 or Item 41. Provide the revised Preliminary Site Layout Plan inclusive of all Project components from the Application's Preliminary Site Layout Plan and those additionally requested throughout response to Staff's First Request.

21. Refer to Mantle Rock's responses to Staff's First Request, Items, 43, 44, and 48. Identify whether the existing Buma Tap-Joy transmission line is 61 kV or 69 kV.

22. Explain how the proposed transmission line would not have a significant adverse impact on the scenic assets of Livingston, Kentucky.

23. Refer to Mantle Rock's response to Staff's First Request, Item 3 and Item 58. Receptor R-08 is noted to be non-participating and owned by Chittenden. State if this property owner is the same as the owner of the Project parcels.

24. Refer to Mantle Rock's response to Staff's First Request, Attachment 1-120, Revised Decommissioning Plan. Provide the total length and width for the paved portion of the access road.

25. Refer to Mantle Rock's response to Staff's First Request, Attachment 1-120, Revised Decommissioning Plan. Confirm that the Decommissioning Plan includes the augmentation BESS enclosures and PCSs (inverters). If not confirmed, explain the response.

26. Refer to Mantle Rock's response to Staff's First Request, Attachment 1-120, Table 2. Perimeter fencing for the Project is indicated to be 33,933 feet long, but only 32,677 feet are included in removal costs.

a. Explain this discrepancy.

b. Provide a revised Table 2 accounting for the change in the perimeter fencing to incorporate the laydown area west of Carrsville Rd within the fenced area.

27. Refer to Mantle Rock's response to Staff's First Request, Attachment 1-120. The Revised Decommissioning Plan states that the Project substation will be under Midcontinent Independent System Operator (MISO)/Federal Energy Regulatory Commission (FERC) ownership and will not be removed as part of decommissioning. Explain MISO/FERC's plan for use of the substation after decommissioning, given that other Project components will be removed.

28. Refer to Mantle Rock's response to Staff's First Request, Item 12. Provide in detail, the communication and contact that Mantle Rock has had with the owners of residential structures within 2,000 feet of the Project boundary line in regard to the construction of this project.

29. Provide the noise level for the residences during peak construction for those nearest non-participating residences identified as being nearest to the fencing, closest solar panel, closest inverter, substation and battery storage.

30. All other qualifications for the positions being equal, explain whether Mantle Rock intends to hire as many local workers for construction and operation phases of the project as possible. If so, include how Mantle Rock intends to accomplish that.

31. Provide the anticipated start date and end date of construction.

32. Detail any communications with members of the public, including neighboring landowners, regarding construction noise.

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

34. Explain whether neighbors or adjacent landowners will be affected by noise levels during pile driving. Provide any documents or studies to support the explanation.

35. Provide the estimated maximum construction sound level or the maximum potential construction sound for all receptors that are 500 feet away from project components (i.e., fence, panel, inverter, substation, BESS).

36. Explain whether a power purchase agreement has been finalized. If not, provide a timeline for drafting and finalizing a power purchase agreement.

37. Provide any updates to vegetative screening plans.

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

39. Provide the average number of construction workers on-site each day over the course of the construction period.

40. Provide the peak daily number of construction vehicles accessing the site, identified by vehicle type (i.e. worker vehicles, delivery trucks, cement trucks, water trucks, tractor trailers or other types of general delivery trucks (if utilized), and other.

41. Explain any commitments regarding infrastructure removal or land restoration during decommissioning, including in the landowner lease agreements.

42. Provide the name of the company that will employ the individuals that are or will be responsible for ensuring compliance with the statements in the Application, as well as any conditions imposed by the Siting Board during construction and operation of the project.

43. Provide a parcel map for the proposed site. Include all residences within 500 feet of the proposed project site. Include whether the residences are participating or non-participating homes.

44. Provide a parcel map for the proposed site. Include all residences within 2,00 feet of the proposed project site. Include whether the residences are participating or non-participating homes.

45. Provide the corporate structure for Mantle Rock and any entities that might have ownership interest in this project.

46. Provide any improvements that will be made to the existing road anticipated to be used to access the substation/BESS area.

47. Refer to SAR, Appendix M. Provide an update on the National Register of Historic Places status of the five unidentified resources that could possibly affect the proposed project.

48. Provide a map that identifies which segments of the medium voltage collection system that are underground, which segments are above ground and the location of the transmission lines with the right-of-way distinguished.

49. Refer to Mantle Rock's response to Staff's First Request, Item 71. Explain how Mantle Rock will work with Good Hope Church to avoid construction during Sunday service, Wednesday bible studies, and other church-related events, including funerals.

50. Refer to SAR, Appendix G, Noise Analysis at 12 and Mantle Rock's response to Staff's First Request, Item 14. Explain whether Mantle Rock plans to coordinate with all three cemeteries around and within the Project area to limit construction activities during funerals.

51. Refer to Mantle Rock's response to Staff's First Request, Item 14. Provide the noise impact for the construction and the operation of the Project for the third cemetery that was not included in the original analysis.



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 10 2025

cc: Parties of Record

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