COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF EXIE SOLAR, LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 110 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY AND NONREGULATED ELECTRIC TRANSMISSION LINE IN GREEN COUNTY, KENTUCKY	)))))))	CASE NO. 2025-00151

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

Exie Solar, LLC (Exie Solar), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 5, 2025. The Siting Board directs Exie 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 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.

Exie Solar shall make timely amendment to any prior response if Exie Solar 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 Exie Solar fails or refuses to furnish all or part of the requested information, Exie 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 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, Exie 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 leases or purchase agreements, including options, separate agreements, or deeds which Exie Solar has entered into in connection with the proposed solar facility, including the agreements for each of the parcels of the project.

2. Detail any contracts by which Exie Solar has paid, has negotiated to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near

the project. Include the terms of the agreements and which properties are involved, in terms of distance, to the project boundaries.

3. Throughout the Application and Site Assessment Report (SAR), in-PDF references to supporting exhibits are broken and return an error within the text. For example, see Site Assessment Report Section 3. Correct where appropriate and ensure all appropriate documentation has been filed.

4. Refer to Application, Table of Contents, Section I SAR. The application does not reflect the attachments provided in the SAR. Correct to ensure that the attachments coincide with the SAR.

5. Refer to the SAR, Section 2.1. The table indicates surrounding land uses appears to be based on each land use category's share of the total acreage abutting the project. Provide the proportions of surrounding land uses based on the number of surrounding parcels in each land use category.

6. Refer to the SAR, Section 2.1. Commercial and recreational surrounding land uses are less common than agricultural, residential and industrial land uses for most solar projects in Kentucky. Please provide additional information regarding the makeup of these surrounding land uses.

7. Refer to the SAR, Section 2.3. Specifically, the first occurrence of the term "agricultural-style perimeter fence" which is then used throughout the SAR. Explain whether the fencing shown in the simulated images in the visual impact assessment (e.g., the Proposed View simulations for Viewpoint 11, sheet 3 of 8 and for Viewpoint 46, sheet 7 of 8) are an accurate portrayal of the type of fencing anticipated for the facility.

8. Refer to the SAR, Preliminary Site Plan, Attachment A, page 15.

a. Explain whether the several “islands” within the overall site will or will not have solar panels or be surrounded by project fencing.

b. Explain whether these isolated areas are all owned by non-participating landowners.

c. Explain whether these particular landowners raised any issues or concerns about the proposed facility. If so, explain what issues they have raised.

9. Explain why Exie Solar has chosen a site with so many non-contiguous parcels.

10. Explain how a non-contiguous Project site can be developed and function as a single, integrated Project.

11. Explain how power generated within the non-contiguous portions of the Project site will be delivered to the substation.

12. Explain whether the construction and operational entrances will be locked outside of normal working hours.

13. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, including the length of each construction phase. Include when the peak construction would occur within the timeline.

14. Provide what time of day construction, operation and maintenance activities will begin and end each day.

15. Provide a narrative description of the location of each laydown area to be used during construction.

16. Provide a narrative description of the location to each of the following site features:

a. Each construction entrance.

b. Each entrance to be used in operations.

c. Operation & Maintenance (O&M) area.

d. Each laydown area.

17. Provide the type and method of pile driving equipment that will be utilized at the time of construction.

18. Explain whether neighbors or adjacent landowners will be affected by noise levels during pile driving.

19. Describe for what purpose, how often, and where within the project footprint a rock drill would operate during the construction of the proposed project.

20. See Noise Assessment Report, Table 1. Identify the source of the reference point noise level for 'Solar Post Pile Driver' and describe how this machine differs from an impact pile driver (which has a typical reference point noise level of 101 dBA at 50 ft according to Federal Highway Administration).

21. See the Noise Assessment Report. Update Appendix C of to include a column reporting the overall maximum modeled sound pressure level (dBA) for each receptor during the construction phase for the proposed project.

22. Provide a detailed table listing all residential structures within 2,000 feet of the Project boundary line. Indicate whether the residential structures are participating or non-participating.

23. 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.

d. The distance to the substation.

24. 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 any 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.

e. The distance to the substation.

25. Refer to the Application, Record of Environmental Violations, page 10. Provide the entities with a direct ownership interest in Exie Solar. Also provide the corporate structure of those entities.

26. Provide a list of permits that will be required from any other local, state, or federal agencies for the project. Include in the response the status of those permits.

27. Provide a one-page site map that contains the locations water features, including rivers, streams, lakes, and ponds. Also include any known or suspected karst features.

28. Explain whether the perimeter security will be installed according to National Electric Safety Code (NESC) standards. Include in the response whether the fencing will be installed before any electrical work begins.

29. Explain whether the substation will have its own separate fencing and if it complies with NESC standards.

30. List all churches or other religious facilities within a two-mile radius of the project. Provide the corresponding distances from the facility to the closest site boundary.

31. Provide any communication with any churches or other religious facilities regarding the project. Provide any concerns that were raised.

32. Explain if an Engineering, Procurement, and Construction (EPC) firm has been selected for the project. If not, provide the request for proposal (RFP) for the EPC contractor.

33. Provide any communication that has occurred with any schools within a two-mile radius of the project. Provide any communication and any concerns that were raised.

34. The proposed Project site sits in a karst prone region with high groundwater sensitivity levels. Provide any mitigation measures Exie Solar will implement during construction and operations in response.

35. Provide the security measures for the operating and maintenance (O&M) areas and substation within the project's boundaries.

36. Explain how Exie Solar will coordinate with local law enforcement and fire services regarding security and emergency protocols during construction and operations.

37. Explain whether any existing structures on the project site will be demolished during construction.

38. Describe any utilities that will be required during construction or operations and what utility will provide the service.

39. Explain whether there will be vegetation clearing for construction. Provide in the response the number of acres that will be cleared and any permits that will be required.

40. Provide the total length of cabling to be used in the projects' collection system.

41. Explain if the medium voltage collection system will be underground, aboveground, or both. If the MV collection system will be underground and above ground, provide a map that shows which segments are underground and which segments are above ground.

42. Provide copies of any documents submitted to other agencies, other than what was included in the application.

43. Explain how the project has been designed to minimize the amount of tree clearing required.

44. Describe and provide information regarding what federal and state agencies that Exie Solar is coordinating with regarding the tree clearing strategy for protected bats.

45. Provide a wetland delineation report for the project. If one does not exist, provide when one will be produced.

46. Explain whether the Site Layout Plan will be modified after the Wetland Delineations are completed.

47. Explain whether Light Detection and Ranging (LiDAR) been utilized during research and evaluation of the project.

48. Provide a map and identify all cemeteries located within a two-mile radius of the project and provide if the project will restrict access to them in any way.

49. Provide a one-page directional map showing highlighted anticipated delivery routes for the project. Include on the map: access roads, access points, existing roads, bridges, electric generation components, and all structures within two miles of the project. Differentiate between roads and bridges that will and will not be used for deliveries.

50. Provide a map highlighting all construction entrances to the Project site and all roads proposed to be used.

51. Identify all bridges along all roads proposed to be used during the delivery/construction phase of the project. Identify the width and weight capacity of each bridge and any upgrades or repairs that will need to be made prior to the commencement of construction.

52. Explain the plan for repairing Project-related damage to any roadways or bridges.

53. Provide any sketches of the proposed transmission line support structure.

54. Explain how the proposed transmission route was determined.

55. Provide the rights-of-way for all transmission lines that transect any portion of the project site.

56. Provide a narrative description of the proposed transmission line and alternate route, including the number of poles to be installed, the height of the poles and the length and width of the transmission line corridor.

57. Explain how the proposed transmission route was determined.

58. Provide a map showing the existing property lines that the proposed transmission line is proposed to cross.

59. Provide information on all electric transmission lines that intersect the project. Include in the response the owner, voltage, status, and right-of-way (ROW) setbacks.

60. Detail any communication with the residences closest to the proposed substation location.

61. Refer to the Kentucky Geological Survey Oil and Gas Wells Search (KY Geode: KGS Oil and Gas Wells Search (uky.edu)).

a. Provide a map with all active and inactive oil or gas wells on the proposed site. Also include any gas-gathering pipelines associated with the wells.

b. Determine and identify whether any of these wells are currently permitted and active.

c. Explain whether the existence of oil and gas wells and pipelines will require adjustments to the proposed location of solar panels.

62. Explain whether Exie Solar will pursue an Industrial Revenue Bond and Payment In Lieu of Taxes agreement with Green County. If yes, explain how that might change the cumulative tax revenues of the Project.

63. Explain whether Exie Solar intends to hire as many local workers for the construction and operations phases of the project as possible, all other qualifications for the positions being equal. Include in the response an explanation of how Exie Solar will ensure this occurs.

64. Refer to the Application, SAR, Attachment G, Noise Assessment Report. Provide a map that displays and labels each noise receptor listed in the report.

65. Refer to SAR, Attachment D, Appendix A. Provide a table for the Construction Sound Model results. Include the results for pile driving in the table.

66. Provide a detailed table outlining the anticipated construction noise levels for each non-residential structure within 2,000 feet. Include sound levels for pile driving, and the number of feet from each structure.

67. Provide a detailed table outlining the anticipated operational noise levels for each residential structure within 2,000 feet. Include sound levels for inverters, panels, and substations, and the number of feet from each structure.

68. Regarding construction noise, provide all mitigation measures considered for noise dampening during the construction phase.

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

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

71. Provide a copy of the stormwater management plan for the project.

72. Explain whether the site will be irrigated to promote vegetation.

73. Provide any geotechnical reports for the project.

74. Provide any environmental studies that have been completed for the project including Phase I Environmental Site Assessment for the Project.

75. Provide any historic or archeologic studies that have been planned or completed for the project site.

76. Provide the Construction Dust Control Plan for the project.

77. Provide a copy of the Groundwater Protection Plan.

78. Provide any communication with local emergency services on security and emergency protocols during construction and operations. If contact has not been made, explain when that contact will occur.

79. Provide who will control access to the site during construction and operations.

80. Refer to the Site Assessment Report, Attachment H Route Evaluation Study. Provide the traffic modeling and results that support the conclusion "No delays to local traffic should be experienced except." Update Table 1 with an additional column showing maximum average daily traffic expected during the construction phase.

81. Refer to the Noise Assessment and Route Evaluation Study.

a. Provide the weight limits of each local roadway to be used for construction traffic.

b. Provide the number of worker vehicles traveling to the site each day during construction.

c. Provide the number and approximate weight classes of the heavy and light duty trucks anticipated on site per day during the construction phase.

d. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.

82. Identify the specific roadways to be used by heavy trucks, including for delivery of the transformer.

83. 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.

84. Provide any communications with Green County Road Department regarding permits or agreements necessary for the project. If no communication has been initiated, explain when that contact will occur.

85. Provide any communication with the Kentucky Transportation Cabinet District Engineer regarding permits or agreements necessary for the project. If no communication has been initiated, explain when that contact will occur.

86. Provide information on the specifications, model number, and cutsheets of the photovoltaic (PV) cell/solar panels to be used.

87. Explain whether the project will have a battery storage system. If a battery storage system is going to be utilized, provide the following

a. Safety data sheets for the energy storage system.

b. The environmental impact of the batter storage system.

c. Expected life of the batteries.

d. Method to dispose of batteries at the end of the useful life.

e. How the battery storage system installation will comply with National Fire Protection Association Standard 855.

88. Provide information on any fiber optic or communication network installed as a part of the project and any excavation that may be required for the installation.

89. Provide the planned time for construction to begin and end each day. Explain how Exie Solar plans to mitigate arrivals and departures to minimize disruption to the area.

90. Provide any communication representatives of Exie Solar have had with any of the property owners surrounding the project. Explain whether any changes have been made to the project based upon those concerns.

91. Describe the hazard detection systems, such as smoke and heat detectors, as well as gas meters, that will be used within the battery energy storage system (BESS) facility.

92. Describe alert systems that will be in place at the BESS facility and who will monitor and maintain those systems. Include in the explanation whether the systems provide remote alert and annunciation to offsite personnel and the fire department.

93. Describe how the BESS facility will be designed to prevent thermal runaway. Include ventilation and air conditioning (HVAC) systems that will be used.

94. Describe the fire suppression systems that will be installed at the BESS facility. Include in the response the standards those systems will have to meet, who will monitor and maintain those systems.

95. Explain how the BESS facility will comply with the Institute of Electrical and Electronics Engineers 1578 standards in relation to electrolyte spills.

96. Explain whether the BESS facility be designed to withstand environmental hazards that may arise within the area.

97. State the number of residential structures that may have a view of any portion of the Project, including fencing, solar arrays, substation or other infrastructure.

98. Refer to the Decommissioning Plan Exhibit J. If the salvage revenue of $8.3 million cited in the Decommissioning Plan is for PV modules that are less than 30 years old (i.e., the anticipated operational lifetime of the proposed project), update the

Decommissioning Plan with salvage revenue estimates for PV modules that are 30 years old.

99. Refer to the Decommissioning Plan Exhibit J. Please clarify and explain Item 23 in the Cost Estimate Assumptions Section.

100. Provide a table that includes each of the residences in the residential neighborhood. In the table provide the following:

a. Parcel ID.

b. Landowner.

c. Acreage.

d. Structure, design and historical use.

101. Provide a detailed table for each of the parcels provided in response to Item 100 in a table stating the distance measurement in feet (not meters) from each structure to the items listed below:

a. The distance to the boundary line.

b. The distance to the closest solar panel.

c. The distance to the nearest inverter.

d. The distance to the substation.

e. The distance to the BESS.

102. Provide the number of miles between the Exie Solar project and the Horseshoe Bend Solar, LLC (Horseshoe Bend) project in Case No. 2020-00190.[2]

[2] Case No. 2020-00190, *Electronic Application of Horseshoe Bend Solar, LLC For a Construction Certificate To Construct An Approximately 60 Megawatt Merchant Electric Solar Generating Facility in Green County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110.*

103. Provide any overlaps in the projected construction schedules of both the Exie Solar project and the Horseshoe Bend project in Case No. 2020-00190.

Linda C. Bridwell, PE
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Public Service Commission *on behalf of* the Kentucky State Board on Generation and Transmission Siting
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DATED SEP 18 2025

cc: Parties of Record

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