COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF CRAB RUN SOLAR, LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN UP TO 45 MEGAWATT ELECTRIC SOLAR GENERATING FACILITY IN MARION COUNTY, KENTUCKY	)))))	CASE NO. 2025-00276

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

Crab Run Solar, LLC (Crab Run 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 February 16, 2026. The Siting Board directs Crab Run 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 person supervising the preparation of the response on behalf of the entity that 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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Crab Run Solar shall make timely amendment to any prior response if Crab Run 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 Crab Run Solar fails or refuses to furnish all or part of the requested information, Crab Run 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, Crab Run 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 Crab Run 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 Crab Run 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. Provide a parcel map, identifying individual parcels within the Project boundary, owner name, and acreage.

4. Provide the total number of months or years of construction. Explain any potential for deviation to that schedule.

5. Explain when peak construction phases will occur (which month(s) of the full construction period), accounting for construction of all Project components.

6. Provide a schedule and a detailed description of construction activities 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.

7. Provide the average number of construction workers on-site each day over the course of the construction period, accounting for construction of all Project components.

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

9. Provide a narrative description of the location for 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.

10. Explain whether an O&M building will be constructed within the Project boundary. If so, identify the anticipated location of the O&M building on the Preliminary Site Layout map and describe the physical characteristics of the building, i.e., footprint acreage, height.

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

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

13. 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.

14. 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.

15. 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.

16. 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.

17. Explain whether the substation will have its own separate fencing and explain if it comply with NESC standards.

18. 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.

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

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

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

22. Provide a one-page directional map within the county 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.

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

24. Identify all roads within the county 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.

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

26. Explain whether there will be any weather stations located within the Project site. If so, indicate where those stations will be located narratively and on a revised Preliminary Site Layout map.

27. Refer to SAR, Appendix B, Preliminary Site Layout. Provide the total number of site access entrances in use during the construction phase and provide a narrative description of each entrance location.

28. Explain whether each access entrance available during the construction period and during the operational period will have its own security gate.

29. Refer to SAR, Exhibit A, Project Site Map. Confirm that the Project will construct a transmission line. If not confirmed, explain the response. If confirmed, provide a physical description of the Project transmission line, including number of poles and height of poles, as applicable.

30. Refer to SAR, Exhibit A, Project Site Map. Provide the total number of site access entrances in use during the construction phase and provide a narrative description of each entrance location.

31. 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.

32. Explain whether Crab Run Solar plans to have additional face-to-face public meetings with residents.

33. 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.

34. 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.

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

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

37. Provide a copy of the Groundwater Protection Plan.

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

39. Explain how groundwater will be protected during project construction.

40. Explain how surface water will be protected during project construction.

41. 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.

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

43. Refer to SAR, Exhibit H, Traffic Impact Study.

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

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

c. Provide the peak daily number of construction vehicles accessing the site, by vehicle type, i.e., worker vehicles, delivery trucks, cement trucks, water trucks (if utilized), other.

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

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

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

45. Provide the method and route for delivery of the Project transformer.

46. 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.

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

48. Explain whether the Project site will be irrigated to promote vegetation growth and reduce potential erosion.

49. Explain whether any measures will be taken to reduce construction-related noise emissions and impacts for nearby residents during construction.

50. Explain whether a plan to coordinate construction activities around the schedules of local churches has been or will be developed. Provide that plan, if developed.

51. Provide details of any communications with Marion County Road Department. If no communication has been initiated, explain when that contact will occur.

52. 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.

53. Explain whether any oversize or overweight deliveries will require special permits.

54. Explain whether any improvements to roadways in the Project area will be necessary prior to construction.

55. Provide information on the specifications, model number, and cutsheets of the photovoltaic (PV) cell/solar panels to be used. Include where the solar panels will be manufactured.

56. Provide information on the specifications, model number, and cutsheets of the inverts to be used. Include where the inverters will be manufactured.

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

58. Provide any communication representatives of Crab Run 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.

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

60. Explain whether Crab Run 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 Crab Run Solar will ensure this occurs.

61. Explain whether a battery energy storage energy system (BESS) will be a part of this project. If yes, 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.

62. Refer to Application, Tab 6, Public Involvement. There is no mention of a BESS facility on the slides provided. Provide the following:

a. Explain whether Crab Run Solar always intended to include a BESS facility in this project.

b. Explain whether the public is aware that there will be a BESS facility included as part of the project. If so, explain how the public has been made aware of the inclusion of a BESS facility.

c. Explain whether participating landowners are aware there is a BESS facility proposed as part of this project. If so, explain how the participating landowners have been made aware of the inclusion of a BESS facility.

63. Describe the hazard detection systems, such as smoke and heat detectors, as well as gas meters, that will be used within the BESS facility.

64. 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.

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

66. 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.

67. Explain how the BESS facility will comply with IEEE 1578 standards in relation to electrolyte spills.

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

69. Explain whether the BESS will be enclosed within the perimeter fencing, within the separately fenced substation area, or within its own fenced area.

70. Refer to SAR, Appendix E, Landscape Plan. Explain how the specific locations identified for vegetative screening were chosen.

71. Explain how many years it will take planted vegetation to reach maturity.

72. Provide any available transcripts of the public meetings. Provide any written or oral comments offered by the public or government agencies, from public meetings or through other avenues, including the Project website.

73. Provide the number of residential structures and non-residential entities (i.e., churches) that may have a view of any portion of the Project, including fencing, solar arrays, substation or other infrastructure.

74. Provide a photo or visual rendering of the perimeter fencing.

75. Refer to the Application, Tab 10, Economic Impact Analysis. Provide the following:

a. Define the group or groups compromising the 27 “proprietors” referenced in the Tab 10 sections Local Economic Impacts of the Construction Phase and Local Tax Revenues.

b. Explain whether the defined groups include leasing landowners.

c. Explain whether the defined groups include mineral rights holders.

d. Explain whether the defined groups include easement Holders.

e. Explain how “proprietors” in these sections differ from “landowners” identified in Appendix 2 of the Analysis.

76. 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.

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

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

79. Provide how many acres of vegetation, including trees, will be cleared during construction.

80. Provide a map showing all planned areas of vegetative clearing. Include on the map satellite imagery, wetland features, and elevation contours.

81. Explain the tree clearing strategy that will be utilized to protect the endangered bats in the project area.

82. Explain whether there has been any coordination with the U.S. Fish and Wildlife Service or the U.S. Army Corps of Engineers for this Project.

83. Refer to SAR, Exhibit B, Property Value Impact Study. Explain why a site with 68.42% of adjoining parcels being residential along with close proximity to multiple residential neighborhoods was selected.

84. Describe the various utilities that will serve the project, as applicable (i.e. water, gas, sanitary sewer, electrical).

85. Explain whether any structures on site will be demolished prior to or during the construction phase of the project.

86. Provide the total length in feet of proposed vegetative screening.

87. Provide the total linear footage of fence line that will secure the site.

88. Provide how many linear feet of collection system cables will be installed throughout the project.

89. Provide any interconnection studies for the project.

90. Provide a Cumulative Environmental Assessment for the project.

91. Provide a Fire Prevention and Management Plan for the project.

92. Provide a Stormwater Pollution Prevention Plan for the project.

93. Provide any geotechnical desktop studies for the project.

94. Provide a stream and wetland delineation for the project.

95. Explain whether the site layout plan will be modified based on the Wetland Delineations Study.

96. Provide a Phase I Environmental Site Assessment for the project.

97. Provide a Wildlife Concerns Analysis for the project.

98. Provide any Bat Mist Net Surveys for the project.

99. Provide any archeological/historic studies for the project.

100. Provide all communications with owners of transmission lines that intersect the project.

101. Provide whether the substation will have its own secure fencing that meets National Electric Safety Code (NESC) requirements.

102. Provide a parcel map for the project. Include on the map the acreage and owner of each parcel.

103. Refer to the Proposed Site Description at 2. Provide the following:

a. Number of residential neighborhoods were identified within two miles of the Project Area.

b. How many residential neighborhoods were identified within 2000 feet of the Project Area.

104. Provide an individual map for each residential neighborhood identified within 2000 feet of the Project Area. Include on the map parcel boundaries as well as participating and non-participating residences. Accompany the maps with a table for each neighborhood that shows the distance, in feet, of each residence to the project fence line, nearest solar array, nearest inverter, and the project substation.

Linda Bridwell RP

Linda C. Bridwell, PE
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DATED **JAN 30 2026**

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