

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)	CASE NO.
CONSTRUCTION FOR AN UP TO 45)	2025-00276
MEGAWATT ELECTRIC SOLAR GENERATING)	
FACILITY IN MARION COUNTY, KENTUCKY)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO CRAB RUN SOLAR

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 March 23, 2026. The Siting Board directs Crab Run Solar 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 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. Provide the anticipated start date and end date of construction.
2. Provide any communication with the Marion County Road Department relating to traffic plans and mitigation measures. If no communication has been initiated, explain when that contact will occur.
3. Explain whether participating landowners will continue to use property not leased to the Applicant for residential or agricultural purchases.

4. Provide a map showing all planned areas of vegetative clearing. Include on the map satellite imagery, wetland features, and elevation contours.
5. Confirm whether all fencing, installed according to National Electrical Safety Code (NESC) standards, will be installed prior to the commencement of any electrical work. If not confirmed, explain when the fencing will be installed.
6. The proposed substation site, switchyard site, and gen-tie corridor all sit in an area where karst and especially sinkholes are prevalent. Provide the following:
 - a. Whether relocation of these sites is possible or feasible.
 - b. Explain the mitigation measures Crab Run Solar will implement during construction to combat karst should these sites be used.
 - c. Explain the foundation(s) each site will have.
7. All other qualifications for the positions being equal, explain whether Crab Run Solar intends to hire as many local workers for the construction and operation phases of the project as possible. If so, include how Crab Run Solar intends to accomplish this goal.
8. Explain whether a power purchase agreement (PPA) has been finalized. If not, provide a timeline for drafting and finalizing a PPA.
9. Provide any updates to vegetative screening plans.
10. 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.

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

12. Provide the maximum expected load weights for each type of delivery truck, including cement and water trucks, heavy equipment, gravel for access roads, panels, inverters, and the transformer.

13. Provide the average number of on-site vehicles each day over the course of the construction period.

14. 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).

15. Explain how the debris from vegetation clearing is going to be disposed of.

16. Provide a table with the distances from the nearest nonparticipating residence (dwelling not property line) to the following:

- a. Fencing.
- b. Closest Solar Panel.
- c. Closest Inverter.
- d. Substation.
- e. Battery Storage System.

17. Explain the justification for requesting a deviation from the 2,000-foot setback requirement for residential neighborhoods.

18. Explain whether the solar panels and other structures could be reconfigured within the site boundaries to comply with the 2,000-foot setback.

19. Refer to the January 23, 2026 motion for deviation. Provide a parcel map for the residential neighborhoods. For each parcel, provide the total acreage and whether the parcel has a residential structure on the land. If there is a structure on the parcel explain the structure's design, historical use, and current condition.

20. 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.

21. Provide a detailed table for each of the parcels provided in response to Item 20 stating the distance measurement in feet (not meters) from each structure, if applicable, 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.

22. Provide a table with the distances from the nearest nonparticipating residence (dwelling not property line) to the following:

- a. Fencing.
- b. Closest Solar Panel.
- c. Closest Inverter.

- d. Substation.
- e. Battery Storage System

23. Refer to the motion for deviation from the setback requirements. For the closest residence (dwelling not property line) in each neighborhood, provide a table with the distance to the following:

- a. Fencing.
- b. Closest solar panel
- c. Closest inverter.
- d. Substation.
- e. Battery Storage.

24. Provide a parcel map of the proposed site. Include all residences within 500 feet of the proposed project site. Identify the residences as participating or nonparticipating homes.

25. Provide the entities with a direct ownership interest in Crab Run Solar. Include in the response the corporate structure of those entities.

26. Refer to Crab Run Solar's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 99. Identify and provide a description of the historic resource labelled 'MN 556' in the map provided in the response.

27. Provide all communication that has occurred with Kentucky Utilities Company and East Kentucky Power Cooperative, Inc. regarding transmission lines that intersect the project.

28. Provide any communication that has occurred with United States Fish and Wildlife Services. If none has occurred, provide when communication will take place.

29. Provide any communication that has occurred with Kentucky Department of Fish and Wildlife Services. If none has occurred, provide when communication will take place.

30. Refer to Crab Run Solar's response to Staff's First Request, Item 97. Explain what mitigation measures the Project will implement, given the conclusions of the habitat assessment that there is a potential for federally or state listed threatened and endangered species to occur at the site.

31. Describe and explain whether the current topography of the proposed substation location is viable.

32. Provide visual renderings for the proposed project substation in the current topographical area.

33. Describe what earth work will be done to the proposed substation site to allow for proper siting.

34. Refer to the Application, SAR, Exhibit H, Traffic Impact Study. The study recommends that all truck traffic must enter the site through primary access point at Arthur Mattingly Road during construction and operations phases due to Frogtown Road's slimmer lane and 90 degree turns. Provide:

- a. An updated site plan to reflect any changes, if applicable.
- b. The weight limit of Arthur Mattingly Road.
- c. Any permits that will be required for deliveries on Arthur Mattingly Road.
- d. Estimated traffic increases on Athur Mattingly Road given the unavailability of Frogtown Road.

35. Provide which road the project transformer will be delivered on and which access points will be used.

36. Provide the weight of the project transformer and the class/type of truck that will be used to deliver it.

37. Provide any potential concerns about the width of Athur Mattingly Road.

38. Explain how existing internal access roads will be improved prior to construction.

39. Provide the distance between the property owners' parcel boundaries on Frogtown Road and the proposed Project fence line.

40. Explain whether vegetative screening along Frogtown Road will be planted along the adjoining property owners fence line or the Project fence line.

41. Explain if vegetative screening becomes more effective if it is placed further from the view of residential structures.

42. Refer to Crab Run Solar's response to Staff's First Request, Item 74. Provide how the project will ensure an "agricultural style fence" properly secures the site.

43. Provide what setbacks the Project will apply to karst features.

44. Provide copies of any letters sent to adjacent property owners regarding the Project.

45. Provide pertinent information on the following in regard to the sinkhole located near the planned substation location.

a. Explain whether an alternative location for the substation has been assessed, if the sinkhole affects substation design and or construction.

b. Explain whether any alternative measures have been planned to account for potential impact on the substation's transformer oil containment system.

c. Explain what measures are being planned to account for potential impact on the foundation(s) for the substation equipment. (i.e. Transformer, Switchgear, Breakers, and Structural Steel).

d. Explain what measures are being planned to account for potential impact on the substation security fencing.

e. Explain how the Project is going to stabilize the sinkhole and prevent it from expanding.

46. Explain when a decision will be made on whether an operation and maintenance building will be utilized for the project.

47. Provide the distance the transmission line and the boundary of the right-of way (ROW), individually, will be located to the closest nonparticipating landowner.

48. Provide, in detail, the communication that Crab Run Solar has had with the closest nonparticipating landowner from the transmission line or the ROW.

49. Provide a map of the residential structures that may have a view of any portion of the Project. Differentiate between participating and nonparticipating residences.

 

Linda C. Bridwell, PE
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DATED **MAR 05 2026**

cc: Parties of Record

Case No. 2025-00276

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