

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

In the Matter of:

ELECTRONIC APPLICATION OF STMO BN, LLC)	
(STARFIRE) FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY 200)	
MEGAWATT MERCHANT SOLAR ELECTRIC)	CASE NO.
GENERATING FACILITY AND NONREGULATED)	2026-00180
ELECTRIC TRANSMISSION LINE IN KNOTT AND)	
PERRY COUNTIES, KENTUCKY PURSUANT TO)	
KRS 278.700 AND 807 KAR 5:110.)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
TO STMO, BN, LLC

STMO BN, LLC (Starfire), 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 22, 2026. The Siting Board directs Starfire 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

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).

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

Starfire shall make timely amendment to any prior response if Starfire 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 Starfire fails or refuses to furnish all or part of the requested information, Starfire 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, Starfire 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 Starfire 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 Starfire has paid, has negotiated to pay, or which contemplate any compensation to be paid to non-participating landowners located near the project, whether through cash or other consideration. Include the terms of the agreements and which properties are involved, in terms of distance, to the project boundaries.

3. State whether a Cumulative Environmental Analysis (CEA) has been completed for the Project. If so, provide that document.

4. 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.

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

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

- a. Whether the residential structures are owned by participating or non-participating landowners.
- 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.

7. 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.

8. Confirm 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 battery 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.
- f. The storage capacity.
- g. An explanation of whether the BESS system for Starfire 2 will also serve Starfire 1.²

² For the purposes of Staff's First Request for Information Starfire 1 refers to Case No. 2024-00255, *STMO, BN, LLC (Starfire), LLC for a Certificate of Construction for an Approximately 210 Megawatt Merchant Electric Solar Generating Facility in Knott, Breathitt and Perry Counties, Kentucky* Pursuant to 278.700 and 807 KAR 5:110. Starfire 2 refers to Case No. 2026-00180, *STMO, BN, LLC (Starfire), LLC for a Certificate of Construction for an Approximately 210 Megawatt Merchant Electric Solar Generating Facility in Knott and Perry Counties, Kentucky* Pursuant to 278.700 and 807 KAR 5:110.

9. Provide a physical description of the BESS area, including size of footprint, height of components, number of BESS units and PCS/inverters, fencing plans, and other physical details.
10. Provide information on the specifications, model number, dimensions, useful life, and safety measures for the BESS that will be used.
11. Describe the hazard detection systems, such as smoke and heat detectors, as well as gas meters, that will be used within the BESS facility.
12. 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 alerts and annunciation to offsite personnel and the fire department.
13. Describe how the BESS facility will be designed to prevent thermal runaway. Include ventilation and air conditioning (HVAC) systems that will be used.
14. 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.
15. Explain how the BESS facility will comply with IEEE 1578 standards in relation to electrolyte spills.
16. Explain whether the BESS facility be designed to withstand environmental hazards that may arise within the area.
17. Explain which local fire department will be responsible for serving Starfire 2 and its BESS system. Describe any communications to date with that fire department to date.

18. Refer to Application, Site Assessment Report (SAR), Attachment 1, Site Plan Layout.

a. Provide the total number of site access entrances in use during the construction phase.

b. Provide a narrative description of each construction entrance location.

c. Provide a revised site layout map if these locations have changed.

19. Refer to Exhibit H, SAR, Attachment A, Site Plan Layout.

a. Provide the total number of site access entrances in use during the operations phase.

b. Provide a narrative description of each operation's entrance location.

c. Provide a revised site layout map if these locations have changed.

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

21. Provide an update on the status and schedule of construction for the Starfire 1 project and describe the extent (duration) during which construction of the two projects is expected to overlap, if any.

22. If there is any projected overlap between construction activity on Starfire 2 and construction activity on Starfire 1, describe how that overlap could affect the findings in the Transportation Assessment Report included as SAR, Attachment 6. In particular, explain how any potential overlapping construction activity on Starfire 1 and Starfire 2 could affect the conclusion from the Transportation Assessment Report that "the four

critical roadways are expected to operate with minimal delay at LOS B or better operations during the critical weekday peak hours with Project peak construction traffic.”³

23. Refer to SAR, Attachment 6, Transportation Assessment Report. Provide the following:

- a. A construction phase timeline.
- b. The current best estimate of the number and approximate weight classes of the heavy and light duty trucks anticipated on site per day throughout the construction timeline.
- c. The estimated weight of the proposed project's required substation transformer and the truck class necessary for its delivery.
- d. The weight limit ratings for each local roadway to be used during project construction.

24. Provide further information regarding the hours and days of the week that the guardhouse is expected to be manned during construction and during operations.

25. Refer to SAR, Attachment 1. The second map indicates that there will be separate access gates to each of the array areas. Confirm that each of the array areas will be individually fenced and describe the hours during which those gates are expected to be locked during construction and operations.

26. Refer to the Application, Exhibit A, Sensitive Receptors and Residential Neighborhood Map. This map indicates that there is a University of Kentucky owned forest plot within the proposed project area. Describe any communications to date with

³ Application, SAR, Attachment 6 at 7.

the University of Kentucky regarding the forest plot and whether access to the forest plot is expected to continue during and/or after construction of Starfire 2.

27. Provide a detailed description of construction activities, including a construction timeline and schedule by activity, accounting for construction of all Project components. Explain any potential for deviation to that schedule.

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

29. 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.

30. Provide details of any communications to date with the Kentucky Transportation District Engineer regarding the proposed project, traffic impacts, heavy deliveries to site, or mitigation measures.

31. Provide details of any communications to date with the Perry and Knott Counties Road Department regarding the proposed project, traffic impacts, heavy deliveries to site, or mitigation measures.

32. Provide the method and route for delivery of the Project Transformer.

33. Refer to Exhibit H, SAR, Attachment F, Traffic Assessment. Provide the location and weight limit ratings for all bridges within two miles of the Project area. Indicate which bridges will or may be used by Project construction traffic and deliveries.

34. Provide the average daily number of construction vehicles accessing the site by vehicle type (i.e., worker vehicles, delivery trucks, cement trucks, water trucks, etc.).

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

36. Provide the maximum expected weights for each type of delivery truck, including cement and water trucks.

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

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

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

40. Refer to Exhibit H, SAR, Attachment F, Traffic Assessment. Provide the plan for repairing Project-related damage to any roadways, railway crossings, or bridges.

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

42. Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries. If yes, provide the expected location(s), frequency and length of those stoppages.

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

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

45. Refer to the Application, page 4, Item 8. The proposed Starfire 2 project intends to use the same project substation as the Starfire 1 Solar project. Confirm that the transmission route and transmission line from the project substation to the existing Harbert substation will be the same as the Starfire 1 generating facility. If not confirmed, explain the response.

46. Provide a topographic profile of the proposed transmission line route between the project substation and the existing Harbert substation.

47. Provide an estimated breakdown by county of the “approximately 1,500 acre-site” and the 1,273 acres that would be within the project fenceline between Knott and Perry counties.

48. Provide the existing daytime ambient sound level(s) for the Project site.

49. Provide a detailed landscaping and screening plan. Include the following:

- a. Identifying the location of proposed screening;
- b. The basis for screening locations;
- c. The length of different segments of screening;
- d. The types of vegetation to be installed;
- e. Their height at maturity, length of time to maturity;
- f. Plans for on-going maintenance; and
- g. Other details related to the proposed screening.

50. 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.

51. Provide a map showing all proposed areas of vegetative clearing within the Project site.

52. Provide a photo or visual rendering of the perimeter fencing. Provide visual renderings of Project facilities with and without vegetative screening at highly visible locations around the Project site.

53. State any concerns or comments provided by representatives of local churches or civic organizations.

54. Provide any written or oral comments offered by the public or government agencies, from public meetings or through other communication methods, including the Project website.

55. Explain whether a Complaint Resolution plan has been developed for the Project. If so, provide that document. If not, explain how Starfire will coordinate with local landowners or others in case of complaints or other issues that might arise during the course of construction or operations.

56. 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.

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

58. Explain in detail what electrical inspections will be conducted by local, county and state agencies for this project.

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

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

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

62. Provide a copy of the Groundwater Protection Plan.

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

64. Provide any communication representatives of Starfire 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.

65. 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.

66. Provide how many residential neighborhoods exist within 2,000 feet of the Project.

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

68. Provide the total linear , of fence line that will secure the site.

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

70. Provide any interconnection studies for the project.

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

72. Provide any geotechnical desktop studies for the project.

73. Provide a stream and wetland delineation study for the project.

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

75. Provide a Wildlife Concerns Analysis for the project.

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



Justin McNeil

Executive Director

Public Service Commission *on behalf*
of the Kentucky State Board on
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DATED OCT 2 2026

cc: Parties of Record

Case No. 2026-00180

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