

CASE NO. 2020-00206
AEUG FLEMING SOLAR, LLC
RESPONSES TO HARVEY ECONOMICS' SECOND REQUEST FOR INFORMATION
TO AEUG FLEMING SOLAR, LLC APPLICATION FOR A CONSTRUCTION CERTIFICATE

I. Construction phase activities

- A. According to the response to Question IA, AEUG states that the construction period is expected to last 62 weeks (about 15 months), instead of the 11 months previously stated (Section 3.2 “Construction Traffic” in the “Noise and Traffic Study”). Please confirm this change from 11 months to 15 months.**
- 1. In what month is construction expected to commence and end?**
 - 2. HE understands (via the Applicant’s response to V-A-7) that construction crews will normally work within daylight hours. Work performed during the day will cause different noise and traffic effects than if the work was performed after normal work hours. How often should HE assume construction will occur after 7pm?**
 - a. How will construction be affected if work ceased at 7pm each day?**
 - 3. During summer months, when sunlight can exist until almost 10pm, is the Applicant expecting construction activities to last until sundown?**
- B. We understand the Construction Schedule to mean that the numbers in the week columns represent the count of laborers expected to be on site in that week. For example, “Civil Works” week #10 has a “3” – does this mean a total of three laborers will be on site? And in week #16, a total of 11 laborers will be on site? These estimates appear to be a much smaller construction workforce than indicated in the Economic Impact Report. Please explain or resolve this discrepancy.**
- 1. Please provide a table showing the average number of construction workers by quarter over the construction period, including the workers required to construct the Point of Interconnection.**
 - 2. Please provide a table showing the peak number of construction workers by quarter over the construction period, including the workers required to construct the Point of Interconnection.**
 - a. How long is the peak construction period expected to last?**
 - 3. Please provide a table showing the peak number of construction-related vehicles by quarter over the construction period, including the vehicles required for construction of the Point of Interconnection.**

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- 4. In the Construction Schedule, what does the “235” represent under the “Week #” column heading?**
 - a. What does the “235” represent under the “MWp” column heading?**
 - i. What does “MWp” represent?**
- C. In what month will construction for the Point of Interconnection commence?**
- D. Will construction of the Project be sequential by parcel or simultaneous construction activity, i.e. drive the piles and install the panels throughout before moving to next activity?**
 - 1. Will the contiguous parcel be completed first, and then all construction activities will commence on the noncontiguous (western) parcel?**
- E. If vegetative buffering were needed, could that be phased in when the construction fence was installed?**

Response:

A.

1. Depending on the issuance of the required permits and progress of the interconnection, the current estimation is to start by approximately February 2022 and reach completion by approximately April 2023, which is about 15 months.

2. Working after 7 pm will only happen for some very specialized work (normally not creating any noise) such as substation commissioning or in case the construction works are severely delayed.

- a. In normal circumstances, the work will not occur after 7 pm. Only if construction works are delayed and eventually for certain activities, longer hours will be

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required. There are specialized works (substation commissioning for example) that can happen anytime of the day but this type of works is not normally a source of noise.

3. In normal circumstances, the work will cease no later than 7 pm, except in case of construction delays or very specialized works.

B.

The numbers in the schedule mean the number of MWdc per week. For reference the project capacity has 235 MWdc. The total number of workers was provided in the previous set of responses (about 600 in peak)

1. See attached Excel spreadsheet with the approximate manpower load per quarter.
2. See attached Excel spreadsheet with the approximate manpower load per quarter.
 - a. For approx. 20 to 25 weeks all activities (civil, mechanical, electrical) will be happening in parallel. That is the considered peak construction period.
3. See attached Excel spreadsheet with the approximate manpower load per quarter.
4. 235 is the DC capacity of the project, expressed in MW.
 - a. 235 is the DC capacity of the project, expressed in MW.
 - i. $MW_p = MW_{DC}$ or DC capacity

C.

The month construction will start for the Point of Interconnection is unknown, but it will be 8-9 months before the contracted backfeed date.

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D.

Please refer to the schedule provided in response to Harvey Economics' First Request for Information, Item I.

1. Works are divided in civil works, piling, mechanical assembly and electrical works. Activities will happen sequentially. This means for example that once piling is complete in one parcel, piling works will start in the other parcel. So, in one parcel we will have piling and in the other parcel mechanical assembly, but there will be construction works on both sites at the same time. There is no decision on where the works would start.

E.

The right timing for vegetative buffering would have to be studied. These kinds of activities normally happen at the final stages of construction.

Witness: Jaime Saez Ramirez

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II. Site development plan

- A. The updated Preliminary Site Plan map (identified as Exhibit A in the response to RFI#1) does not include the locations of the three staging areas described in the response to HE's Question II-4-a. Please provide an updated map showing the locations of the three staging areas.**
- 1. Will the three staging areas have security fencing during construction?**
 - 2. Please also identify internal roads to be constructed within the Project boundary and the substation, O&M facility and warehouse buildings on the updated map.**
- B. The updated Preliminary Site Plan map identifies an additional access point/ road in the southeast portion of the Project that was not included in the original Site Layout graphic of the SAR. Please confirm that there are now 10 different access points/ roads going into and out of the Project boundary.**
- C. How many feet or miles of new gravel access roads will be created, including access roads entering the Project Area from public streets and roads constructed within the project boundaries? This data was not included in AEUG's responses to RFI #1.**
- D. Please confirm that the total acreage within the Project boundary is 1,857 acres (stated in AEUG's response to Question 18 in the Siting Board's RFI #1).**
- 1. Please confirm that the 1,590 acres described in Section 1 of Volume 1 of the Application is the estimated acreage that will be covered by project components (i.e., solar panels, inverters, buildings).**
- E. The Project Parcel and Project Tract maps provided in response to question II-E are helpful. What is the difference between those two maps, other than the Project Parcel map labeling parcel numbers and owner names?**
- F. Please confirm that the legal description of the "site", as included in Appendix B, describes the legal boundaries of the participating properties, which, according to the Project Parcels map included in the response to RFI #1, appears to cover a larger area than the Project boundary.**
- 1. If that is true, how many acres of land are included in the legal description (Appendix B)?**

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Response:

A.

Please refer to the updated site map attached as Exhibit 1, where the three staging areas appear.

Note that we have slightly moved the substations (ours and EKPCs) to the north by approximately 500 feet.

1. This depends of the construction sequence (i.e the main fence is built or not when valuable goods arrive to site, for example cables). If valuable goods are in the staging area, it will normally have at least a temporary fence. This will be removed, and the staging area restored, at the end of construction.
2. Please refer to the updated site map

B.

There are 10 potential access points. In the detailed engineering phase, the most likely scenario is that one of the access points from the north, plus one from the south plus another one for the isolated parcel at the NW of the site are finally selected.

C.

Approximately 27 miles. Note this figure can widely change during the detailed design phase.

D.

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The total acreage within the Project boundary is 1,857 acres.

1. Yes, the 1,590 acres described in Section 1 of Volume 1 of the Application is the estimated acreage that will be covered by project components (i.e., solar panels, inverters, buildings).

E.

The difference between those two maps is the labeling of parcel numbers and owner names.

F.

Confirmed; the legal description of the "site" in Appendix B describes the legal boundaries of the participating parcels, inclusive of certain areas that have been excepted from the lease agreements. The surveyed acreage corresponding to the legal description of the participating parcels is approximately 2,278.63 acres.

Witnesses: Jaime Saez Ramirez
A- C Jaime Saez Ramirez
F - Kyle Gerking

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III. Setback Deviation Request

- A. HE has no follow-up questions related to the setback deviation request. We understand that AEUG plans on filing a Motion for Deviation “in the next ten days or so”. Unless that Motion is filed and provided to HE for review when these responses are submitted, HE may not be able to finalize a recommendation regarding this request as part of the SAR review report to the PSC.

Response: The motion is being filed contemporaneously with these responses.

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IV. Property values and land use

A. Kirkland Report- Please confirm that although 76 properties are listed as “Adjoining Properties” in the original report (pages 4-7), five of those properties are not truly adjoining, but are simply “in proximity” to the project, as described in the Kirkland response to questions in Section IV in RFI #1.

1. If yes, why are the five properties that do not have any adjoining linear feet included as “adjoining properties” in the report?

B. What is the distance, in feet, between the warehouse building located on the commercial parcel owned by Story Properties, LLC and the nearest solar panel?

Response:

A.

1. As mentioned in Kirkland’s January 2021 response, the data was originally compiled in September 2020 using AcreValue software and was updated in January 2021 using the Fleming County PVA data which resulted in minor changes in acreage and current owners. The measurements for the distance from closest panel to closest point on an adjoining home is based on the KMZ data file and GoogleEarth measurements which provided a better basis than measuring off of than the Fleming County GIS. Kirkland could rely on the location of the panels within the parcel as indicated by the KMZ file, which would not be possible using the Fleming County GIS. AcreValue, Fleming County PVA and Google Earth data did not match up with one another. The five parcels listed as “Adjoining Properties” that do not have any adjoining linear feet were include as recognition that the parcel data available may have some errors and these properties were close enough that complete survey and title work may render them adjoining,

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B.

The distance between the warehouse on the commercial parcel owned by Story Properties, LLC and the nearest solar panel, according to GoogleEarth, is approximately 880-feet.

Witness: April Montgomery

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V. Traffic

- A. Table 3.2-1 of the “Noise and Traffic Study” contains the average and peak number of vehicles expected to visit the Project site during the construction stage. HE is seeking information about the weights of these vehicles.
1. Based on the Applicant’s responses in V-A-5 and comparing those to Table 3.2-1, HE assumes the following:
 - a. “Employee Passenger Vehicles” (40 average and 90 peak per day) are 4,500 – 8,000 pounds.
 - i. The count of vehicles seems to be inconsistent with the Economic Impact Study and the peak construction time in the Construction Schedule. The assumption of 3.4 – 7.6 workers per car (302 FTEs / 90 & 40 vehicles) is atypically high of construction projects. Will the Applicant be organizing a carpool program to reduce the number of vehicles travelling to the site? Or please confirm that the number of construction worker vehicles be in the range of to 1.5 workers per vehicle on site each day, which might be typical.
 - ii. Will the Applicant shuttle in employees from locations off-site via buses?
 - iii. Per the Applicant’s response to II-D-2, should these vehicle estimates be increased by 20 for an average day and 30 for a peak day, to account for the Point of Interconnection employees?
 - b. “Heavy-Duty Delivery Trucks” (8 average and 16 peak per day) are at most 80,000 pounds. HE assumes these trucks will bring heavy construction equipment, solar panels, tracking motors, etc, but the Applicant’s response in V-A-5 indicates trucks containing these loads will only travel to the site once every two weeks. Please resolve this frequency.
 - c. “Light-Duty Delivery Trucks” (2 average and 5 peak per day) are roughly 23,000 pounds. The Applicant’s response in V-A-5 indicates FedEx/ UPS trucks containing small tools and parts, etc. will visit the site 1-2 times per week.

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- i. Are HE's assumptions correct? If not, please provide the corresponding weights (including loads) for "Heavy-Duty Delivery Trucks" and "Light-Duty Delivery Trucks" and confirm the estimated number of trips to the site per day during average and peak times during construction.**
- 2. Please confirm the heaviest vehicle is 554,000 pounds or 277 tons, which is nearly seven times heavier than the gross vehicle weight limit for roads surrounding the Project (40 tons).**
 - a. What is the predicted route for this vehicle, and which access point will this vehicle utilize?**
- 3. The Applicant's response (V-A-5) says that "infrequent activity" will include replacement transformers and a truck crane. Will the trips bringing in the transformers and truck crane be transported in one load? Thus, will the combined vehicle weight total 95,000 pounds (25k + 35k + 35k = 95k pounds)?**

Response:

- 1a.i. The use of carpooling to reduce traffic counts and the amount of space required for parking is encouraged on our projects but varies by site.
 - 1.a.ii. This is unknown at this stage.
 - 1.a.iii. Yes
 - 1.b. During the goods delivery phase, that will last approximately 25 weeks, deliveries of equipment can happen any day of the week.
2. Consider the truck will typically have 12 to 16 axles. We understand the 40-ton limit is per axle.
 - a. The route will be decided after a specific route study is conducted.

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The transformer (25,000 pounds) would arrive from the supplier on a flatbed semi-truck (35,000 pounds). We would time the arrival of the locally supplied truck crane (35,000 pounds) to facilitate the removal of the old transformer and installation of the new transformer. The old transformer would then be loaded on the semi-truck trailer and return the old transformer to the supplier.

Witness: Jaime Saez – Ramires and Dave Gladem

4. The Applicant's response (V-B-1) says trips with loads of up to 80,000 pounds will occur every two weeks over the life of the Project. Is this correct?

Response: Acciona's logistics shipments are typically a small volume and are therefore combined with shipments from other entities, in order to maximize the transportation supplier's profit and reduce the shipping company's costs. The truck will make a route, dropping off shipments at several locations \ entities. The 80,000 total pound estimate (35,000-pound load max. + 45,000-pound vehicle & trailer max.) is the worst case, maximum load and vehicle weight estimate for the type of truck normally used for these shipments. There will be weeks where Acciona receives no shipments at all and do not foresee ever receiving loads of 35,000.

Witness: Dave Gladem

B. Will AEUG agree to repair or compensate private parties or local or State government agencies for damage to the roadways each is responsible for?

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Response: AEUG Fleming shall fix or pay for damage resulting from any vehicle transport to the project site in accordance with all applicable transportation permits obtained from State and local road authorities.

Witness: Adam Stratton

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VI. Dust

- A. HE has no follow-up questions related to dust.

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VII. Noise

- A. Section 2.3.2 of the “Noise and Traffic Study” indicates 73 inverters will be used throughout the Project. The Applicant’s response in II-A-6-b indicates 70 inverters. Please confirm the reduction of 73 inverters to 70.**
- B. HE understands the pile installation can take up to 40 weeks. Please confirm that this falls under “Foundations / Poles” in the Construction Schedule, or otherwise state which activity it falls under?**
- C. In the Applicant’s VII-B-1 response, is “105,300 modules” a typo? Should this number be 510,300?**
- D. Please confirm that the noise emission from panel tracking motors is 78 dBA at 1 foot distance and 47 dBA at 10 meters distance (from SAR text in Section 2.3.1 in the “Noise and Traffic Study”).**
- E. What is the maximum level of noise produced by construction activity that “may occur before/after daylight hours” (from SAR text in Section 2.4 in the “Noise and Traffic Study”)?**
- F. The Excel spreadsheets (Appendix B of the “Noise and Traffic Study”) provided by the Applicant say “Fleming 235 MWp Construction Noise Impact Assessment” but the Noise Assessment states the facility is a 188-MW facility. Please explain this apparent discrepancy.**
 - 1. Why do the Excel spreadsheets identify inverters (and not solar panels/ tracker motors) as the “source ID” of the “closest noise sources”?**
 - a. Were tracker motors included in the noise assessment, and if not, why were they excluded?**
 - 2. For how many days might NSA 37 experience a noise level approximate 55 dBA or more during construction activities?**
 - a. Assuming no obstructions that would dampen the sound, what is the distance (in feet) that noise emissions generated from a pile driver approximate 55 dBA?**
 - 3. Does NSA stand for “noise sensitive area,” and refer to residences/ businesses and NOT the operational components of the solar facility?**

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- a. Why were 25 NSAs chosen for the construction noise impact assessment?
 - b. Why were 38 NSAs chosen for the operational noise impact assessment?
 - c. HE requests a map identifying these NSAs, in relation to the Project site.
4. Please confirm HE's understanding that in the "As Proposed Layout" appendix of the "Operational Noise" spreadsheet, 23 of 38 NSAs will experience day and night noise levels of over 50 dBA if the Project is completed as proposed.
- G. In the second of three tables provided by the Applicant in their VII-B-6 response, why are there no structures within 600 feet from the nearest noise emitter, when the residence nearest the solar panels (and thus, nearest the tracker motors) is 212 feet away?
- H. The third table in the series of tables noted above provides the number of structures from the nearest solar panel.
 1. The table indicates 4 residential structures within 300 feet of the nearest panel. However, the data provided by Kirkland in response to questions in Section IV of RFI #1 includes 5 residential structures within 300 feet of the nearest solar panel. Please clarify and provide a revised table, if necessary.
 2. The table indicates that a church is located about 2,100 feet from the nearest solar panel; however, the data provided by Kirkland in response to questions in Section IV of RFI #1 state that the church is 960 feet from the nearest solar panel. Please clarify and provide a revised table, if necessary.
 3. If the third table requires revision, please either confirm that the data included the first table (distance from the property fence) is accurate or provide a revised version of the first table.
 4. Is the metal warehouse located on the one commercial property adjacent to the Project site included in the Other category?
- I. Please confirm that these three tables do not present the total number of structures within a specified distance from either the property fence, nearest noise emitter or nearest solar panel. For example, please confirm that the

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number of structures noted in the table within 600 feet does not include the number of structures within 300 feet and that those two numbers should not be added together to identify all the structures within 600 feet.

Response:

A.

70 inverters is the correct figure.

B.

Correct, pile installation corresponds to "Foundations/Poles." Note a more aggressive progress rate of 8 MWDC per week has been considered in the construction schedule. However, a more conservative ration of 6 MWDC per week, that may lead to 40 weeks, can happen during construction depending mainly on the soil conditions.

C.

510,300 modules is the correct figure with the current design.

D.

Sound power level is the acoustic energy emitted by a source which produces a sound pressure level at some distance. While the sound power level of a source is fixed, the sound pressure level depends upon the distance from the source and the acoustic characteristics of the area in which it is located. As indicated in Section 2.3.1 of the Noise and Traffic Study, the sound power typically produced by panel tracking motors (NexTracker or equivalent) is approximately 78

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dBa. For reference, that equates to a sound pressure level of 47 dBA at 10 meters distance. At 1 foot (0.304 meter) distance, this equates to a sound pressure level of 77.3 dBA.

E.

As indicated in Section 2.2.2, it is anticipated there will be limited noise during the night hours due to construction of the facility. Limited noise generating activities that may be performed would include maintenance of construction equipment (for example, a single impact wrench), hooking up of electrical wiring with hand tools, or other limited activities occurring several hundred feet inside the property boundary. The noise produced by these limited activities are listed in Table 2.2-1. Noise Levels for Common Construction Equipment. For a single impact wrench (85 dBA at 50 feet) the noise generated would be expected to be less than 73 dBA at 200 feet.

F.

Based on the General Layout dated November 4, 2020, the total peak power is 235-MW, but the maximum power at the connection point is 188-MW. The noise impact estimates accounted for all operational noise sources (e.g., inverters, trackers, and the single transformer) based on the preliminary design.

1. Inverters are the main source of operational noise; however, tracker motors were included in the noise impact estimates.
 - a. Yes – tracker motors were included in the noise assessment.

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2. Construction work is expected to progress across the site such that equipment and activities would only be in a single area for a short period of time. Given this, the potential for adverse impacts at any one receptor is expected to only occur for a short period of time during daytime hours.
 - a. Based on the Roadway Construction Noise Model (RCNM), an impact pile driver with a typical maximum noise level of 101 dBA at 50 feet, the approximate distance at which the noise level would attenuate to 55 dBA (Leq) would be approximately 4,445 feet.

3. "NSA" stands for noise sensitive area. However, the term NSA only refers to residences, schools and churches.
 - a. The assessment analyzed a total 38 NSAs. The 25 NSAs selected for the construction impact assessment were the closest NSAs in all cardinal directions. In other word, the other 13 NSAs were in the same cardinal direction but located at a greater distance from the property boundary.
 - b. The operational assessment analyzed a total 38 NSAs. The 38 NSAs selected for the impact assessment were the closest NSAs in all cardinal directions.
 - c. A summary figure showing the location of the NSAs analyzed in relation to the Project Site has been provided as Exhibit 2 (NSA Map – Fleming.png).

4.

Correct. The maximum impact that was estimated as 54.7 Ldn at NSA 19.

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G.

In the second table (Number of Structures from the Nearest Noise Emitter), the number of structures was based on the distance to the inverters and single transformer. The inverters and single transformer represent the dominating source of operational noise. In addition, it is not accurate to assume that each solar panel has an individual track motor.

H.

1. The data used for the noise study was accurate in identifying 4 residential structures within 300 feet of the nearest panel. As noted in the response to question IV.A., multiple data sets were used in completion of the Kirkland report, including AcreValue, which was not used in the completion of the Noise Study.
2. Based on the preliminary design and Google Earth aerial imagery, the northwest corner of the church (Flemingsburg Baptist Church) is located approximately 2,000 feet from the nearest solar panel. This church is identified as NSA 1 in the supporting figure.
3. This data is accurate.
4. Correct.

I.

The number of structures noted in the tables is for corresponding distance ranges. For example: the "600" distance includes structures identified with a range of 301 to 600 feet. To account for the total number of structures the preceding rows would need to be summed.

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Witnesses: A-C Jaime Saez Ramirez
 D – I Brad Sohm

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VIII. Topography/Scenery

- A. The Applicant's response to VIII-A-1 says "need for ... visual screening will be evaluated on a case-by-case basis." Who will evaluate the case-by-case bases?**

Response: AEUG Fleming is conducting an analysis of individual visual impacts at locations in close proximity to the site.

- 1. Will the Board, homeowners, business owners, or others have an opportunity to participate in the decision-making process regarding which areas are screened and which are not?**
- 2. What type of visual screening will be used, in cases where visual screening is needed?**
 - a. Should we assume these are vegetative screens?**
 - b. Can they be planted early in the construction period?**
 - c. How long will it take these visual screening methods to reach eight feet tall?**
 - d. How long will it take these visual screening methods to reach their mature heights?**
- 3. Based on the Applicant's response in VII-A-2, HE assumes the 6-foot-high chain link boundary fence is transparent. Is that correct?**
- 4. Per the Applicant's response in VIII-A-3, please confirm any glare will be eliminated from all viewing points, especially from the high school.**
- 5. Please confirm Appendix F is complete with 22 pages, which includes:**
 - a. Appendix F – 3 pages and no text.**
 - b. Attachment A (Visual Simulations – 5 pages)**
 - c. Attachment B (Line of Sights – 4 pages)**

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d. Attachment C (Photo Log – 10 pages)

i. HE is curious if Appendix F is missing some text from a report written by Tetra Tech.

Response:

1. AEUG Fleming will continue to work with neighboring homeowners and business owners to address concerns related to the visual impact of the project on its neighbors.
2. Various types of screening including fencing and plantings are being considered.
 - a. Vegetative screening is an option.
 - b. Plantings will be scheduled at appropriate times during the growing season to ensure successful establishment and survivability of the plantings.
 - c. Time to maturity for various planting options depends on which species are selected.
 - d. Time to maturity for various planting options depends on which species are selected.
3. Chain link fence is effectively transparent.
4. Glare will be addressed at all locations around the project as the impacts primarily by selecting equipment that eliminates or reduces glare.
5. The Technical Memorandum portion of the Visual Assessment Report was inadvertently omitted from the prior submission and is included with this submittal as Exhibit 3.

Witnesses: Mark Randall and April Montgomery

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IX. Public meeting materials

- A. HE has no follow-up questions related to public meeting materials or public concerns.**

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X. Other permitting activities

A. HE has no follow-up questions related to other permitting activities.

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XI. Economic Impact Report

- A. Section VII – Table 5 notes 166 direct FTEs created in Fleming County during construction and 302 FTEs created across the State.**
- 1. The discussion on page 37 of the report suggests that the actual number of workers hired over the course of the Project would be greater than that because many positions are half-time. How many total workers will be required for construction, including part-time and full-time employees?**
 - 2. In response to RFI #1, AEUG stated that approximately 25 percent of total construction workers are expected to come from within Fleming County (Question IB). That would suggest that if the Project were to require a total of 302 FTEs during construction, then about 75 FTEs would come from Fleming County. Is the Fleming County data in Table 5 inconsistent with the AEUG assumption?**
 - a. Please clarify and provide a revised analysis if necessary (Tables 5, 6 and 7)**
 - 3. Does the economic analysis include the additional workers required to construct the Point of Interconnection – Substation (POI-SS), as described in AEUG's response to Question IID2 of RFI #1? (30 workers at the peak, 20 workers on average for about 18 months). If not, please revise analyses or indicate what adjustment is needed.**
- B. Section VII – Table 7 provides the economic output benefits of the Project in Kentucky and in Fleming County.**
- 1. What is the anticipated total capital cost of Project construction? If this is confidential, please indicate how we might work with AEUG on this point, i.e. provide a range. This economic benefit is noteworthy.**
 - a. What portion of those costs are expenditures for materials and supplies that will be purchased in Kentucky? Purchased in Fleming County?**
 - 2. What are the anticipated annual O&M costs associated with Project operations?**

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- a. What portion of those costs are expenditures for materials and supplies that will be purchased in Kentucky? Purchased in Fleming County?**
- C. Section VIII of the report states that “the expected total property taxes paid over the lifetime of the Project is over \$9.3 million...”**
- 1. What entities will receive those tax monies?**
- 2. How much of the \$9.3 million total amount will each of those entities receive?**

Response:

A.1. The JEDI model does not breakdown the number of full-time versus part-time workers but rather reports the number as Full-Time Equivalent (FTEs).

A.2. No, the Fleming County data in Table 5 is not inconsistent with the AEUG assumption. We used the fact that approximately 25 percent of total construction workers are expected to come from within Fleming County as input into the model that resulted in Table 5. In other words, the result of 166 jobs coming from Fleming County already accounts for the expectation that 25% of the workers will come from Fleming County.

A.3 The Point of Interconnection costs were included in the total project costs used in the model and therefore these workers are already accounted for in the analysis.

B.1. The total project cost is expected to be \$190 million. In addition to installation labor and materials and equipment, this figure includes other “soft costs” such as the cost of permitting and business overhead.

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B.1.a Although some of the materials and equipment will certainly be purchased from within Fleming County and within Kentucky, we did not have a reliable indicator of exactly what percentage would be sourced locally. Therefore, in an effort to be conservative in our estimates of the economic impacts, we assumed that zero percent of the materials and equipment would be sourced from within Fleming and from within Kentucky.

B.2. Please see our response to Item 16 of the Siting Board Staff's First Request for Information.

B.2.a We expect that 25% of the materials and equipment will be sourced within Fleming County and Kentucky.

C.1. Those tax monies will go to the Commonwealth of Kentucky, Fleming County School District, Fleming County General Fiscal Court, Fleming County Library, Fleming County Ambulance, Fleming County Health Department, Fleming County Extension Service, Fox Creek Watershed Conservation District and Fleming County Soil Conservation District.

C.2. Of the expected \$9.3 million total amount, 51.3% or \$4.8 million is expected to go to the Commonwealth of Kentucky, 24.2% or \$2.2 million to Fleming County School District, 8.6% or \$801,000 to Fleming County General Fiscal Court, 5.1% or \$476,000 to Fleming County Library, 4.5% or \$425,000 to Fleming County Ambulance, 2.7% or \$250,000 to Fleming County

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Health Department, 2.6% or \$240,000 to Fleming County Extension Service, 0.5% or \$49,000 to the Fox Creek Watershed Conservation District and 0.5% or \$49,000 to the Fleming County Soil Conservation District.

Witness: David Loomis

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XII. City of Flemingsburg Water Supply

- A. HE has no follow-up questions on this topic. We understand that AEUG plans on providing a supplemental response upon receipt of the applicable Source Water Assessment and Protection Program (SWAPP) document. Unless that supplemental response is provided to HE for review when these other responses are submitted, this issue may not be resolved in the SAR review report to the Board.**

Response: AEUG Fleming is still attempting to locate a copy of the Flemingsburg Water SWAPP Plan. We have contacted Kentucky Source Water Protection program staff, who were unable to locate a copy, and are currently working with the Buffalo Trace Area Development District, who have not been able to locate a copy to date.

Witness: April Montgomery

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XIII. Decommissioning

- A. The public meeting materials included in Volume 1 of the Application indicate a useful life of 30+ years for solar facilities in general. What is the anticipated life of the AEUG Fleming solar facility?**
- B. We assume that AEUG (or any other future project owners) will abide by the commitments made in individual lease agreements regarding decommissioning activities. HE will abide by confidentiality agreements as needed to obtain a typical lease agreement.**

Response:

A.
At least 30 years. It is more than likely that the lifetime is greater but, in the world there are no 30-year old solar plant facilities so the cap of the lifetime is difficult to predict.

Witness: Jaime Saez Ramirez