

Request No. 1: Refer to the response to Siting Board Staff's First Request for Information (Staff's First Request), Item 7, indicating construction will occur over a period of 573 days, which amounts to about 19 months. The chart provided in that response also provides start and finish dates that occur over more than 2 years (Mon 8/9/21—Wed 10/18/23). However, the response to Staff's First Request, Appendix Item I.A, states that construction would occur over a 12-month period. Explain the construction schedule and timeline of construction activities.

Response: The 573 days shown in the schedule for summary line item 1.4.4.2.3 is not a continuous duration of construction but a time span from the beginning of the first activity, through periods of inactivity, to completion of the last activity. It is currently anticipated that the interconnecting utility, EKPC, will require a small gravel pad to be prepared and handed over to EKPC well in advance of commencing construction on the actual solar array, for future construction of EKPC's switchyard. This activity is currently anticipated to occur in August of 2021, last for about 30 days, with subsequent months of inactivity on site. The scheduling software does not deduct inactivity periods but counts the duration from first day to last day.

Responding Witness: Benjamin Lindermeier

Mt. Olive Creek, Solar, LLC
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Request No. 2: The title of the construction schedule provided in the response to Staff's First Request, Item 7, states Mt. Olive Creek; however, the legend label is listed as Horseshoe Bend. Confirm that the construction schedule and activities provided in the response to Staff's First Request, Item 7, are for the Mt. Olive Solar Project.

Response: Confirmed.

Responding Witness: Benjamin Lindermeier

Request No. 3: Refer to the response to Staff's First Request, Appendix Item I.G, that states "restrictions" on the timing of construction activities would be implemented on Sundays "if places of worship are located nearby."

- a. Explain the specific timing restrictions would be implemented on Sundays in those areas.
- b. Explain whether those timing restrictions will be developed in coordination and consultation with local places of worship.
- c. Explain the term "nearby" and how it will be defined, with respect to the distance from a place of worship.

Response:

- a. Mt Olive Creek Solar proposes that no construction activities take place starting one hour before worship activities and do not begin until one hour after worship activities have concluded.
- b. Mt Olive Creek has endeavored to communicate with leaders at the local church but have received only limited feedback.
- c. 1,500 feet.

Responding Witness: Benjamin Lindermeier

Request No. 4: Refer to Staff's First Request, Appendix Item II.E, which states that during construction "a main entrance with office trailer will be identified by the future general contractor". The primary access point will indicate the traffic patterns of incoming trucks and workers. Given the locations of the nine construction access points, the locations of Project facilities within the Project boundary and knowledge of construction traffic and activities, explain what entrance point will be the main construction access point.

Response: It is anticipated that one of the entrances on the northern side of Sano Road, either at the Bennett or Goodin parcel, will be used as the main construction entrance.

Responding Witness: Benjamin Lindermeier

Request No. 5: Refer to Staff's First Request, Appendix Item II.E, that states that during operations, "permanent project access will likely be limited to one access point per project section."

- a. Confirm that there are four "project sections," as outlined by the orange parcel boundaries in Attachment A of the SAR (Preliminary Project Layout).
- b. Given locations of the nine identified access points, the locations of Project facilities within the Project boundary and knowledge of operational traffic and activities, explain what four access points will be used during operations.

Response:

- a. Confirmed.
- b. It is anticipated that the three western portions of the project will be accessed via entrances along Sano Road. The project section east of Hwy 76 will be accessed from Hwy 76. This assumes entrance points will be approved by the relevant traffic agencies.

Responding Witness: Benjamin Lindermeier

Request No. 6: Refer to the response to Staff's First Request, Appendix Item II. The request was for a series of tables showing distances between ALL residential and nonresidential structures up to 2,400 feet from the Project fence line and from solar panels. The response referred to the response to Staff's First Request, Items 8-12. The data only provides distances for the "five nearest" sound receptors (to the substation, inverters or the HVAC system). Given that the Noise and Traffic Study identifies 16 landowner residences within 300 feet of the Project footprint and the Property Value Impact Report lists 30 residences on adjacent properties, the information provided by the Applicant does not respond to the request:

- a. Provide a detailed table showing the number of residential structures located within 300-foot intervals from the Project fence line, i.e., from 0-300 feet, from 300-600 feet, up to 2,100-2,400 feet.
- b. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.) located within 300-foot intervals from the Project fence line, from 0-300 feet up to 2,100-2,400 feet.
- c. Provide a map indicating residences within 300 feet of the Project fence line and a table stating the distances (within 10 feet) of those residences to the fence line.
- d. Provide a detailed table showing the number of residential structures located within 300-foot intervals from the nearest solar panels, from 0-300 feet up to 2,100-2,400 feet.
- e. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.) located within 300-foot intervals from the nearest solar panels, from 0-300 feet up to 2,100-2,400 feet.
- f. Provide a map indicating residences within 300 feet of the nearest solar panels and a table stating the exact distances of those residences to the nearest panels.

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Response:

a.

Distance from Project Fence (ft)	Number of Residential Structures	Number of Commercial Structures	Number of Barns and Other Outbuildings	Number of Churches
0-300	16	1	21	1
300-600	18	2	32	0
600-900	13	0	41	1
900-1200	29	0	28	0
1200-1500	11	0	22	0
1500-1800	8	0	8	0
1800-2100	7	0	14	1
2100-2400	17	0	22	0

b. See Response to Request 6a.

c. See SAR Attachment C. The “Potential Project Footprint” may double as the fence line if

built as proposed. Also, see table below.

Residence	Distance from Potential Project Footprint (ft)	Minimum Distance to Solar Panels (ft)
A	180	200
B	280	300
C	120	150
D	150	170
E	120	150
F	280	300
G	200	220
H	290	310
I	60	150
J	150	170
K	290	310
L	280	300
M	280	300
N	150	170
O	110	150
P	190	210

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d.

Distance from Solar Panels (ft)	Number of Residential Structures	Number of Commercial Structures	Number of Barns and Other Outbuildings	Number of Churches
0-300	10	0	20	1
300-600	19	3	30	0
600-900	18	0	39	1
900-1200	26	0	25	0
1200-1500	11	0	23	0
1500-1800	8	0	9	0
1800-2100	4	0	11	1
2100-2400	13	0	19	0

e. See Response to Request 6d.

f. See SAR Attachment C. The "Potential Project Footprint" may double as the "worst case" panel placement to the residences within 300 ft. of the project.

Responding Witness: Tyler Caron

Request No. 7: Refer to the response to Staff's First Request, Appendix Item II.E. The response stated that the number and acreage of the construction staging areas will be determined by the future general contractor. For purposes of impact evaluation, confirm that the "approximately 10 to 15 acres of the Project site" noted for construction staging in the Cumulative Environmental Analysis is the best available estimate at this time.

Response: Confirmed, though the 10-15 acres may be comprised of multiple smaller staging areas in different project locations.

Responding Witness: Benjamin Lindermeier

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Request No. 8: Refer to Mt. Olive Creek's motion for deviation filed May 19, 2021. Explain why the Project cannot be scaled back or reconfigured within the Project boundary to meet the existing requirements.

Response: Meeting the 2,000 foot setback would require reducing panels placed on the project and jeopardize the economics of the project such that it may not be feasible to construct the project.

Responding Witness: Benjamin Lindermeier

Request No. 9: Refer to the response to Staff's First Request, Appendix Item IV.A. The response states that Mt. Olive Creek does not have information about the current property values of adjacent properties. Explain why Richard Kirkland, who completed the Property Value Impact Report for the SAR, cannot provide that data.

Response: The Mt Olive Creek Response to Appendix Item IV.A. was incorrect. Richard Kirkland does not have the market value, but the assessed property value is in his possession. See below.

Responding Witness: Benjamin Lindermeier

Surrounding Uses

#	MAP ID	Owner	GIS Data		Adjoin	Adjoin	Distance (ft)		Fair Cash Value
			Acres	Present Use	Acres	Parcels	Home/Panel		
1	110-00-00-004.02	Loy	15.10	Residential	1.73%	2.27%	700		Parcel in Adj County
2	030-00-00-057.00	Voils	49.30	Agri/Res	5.64%	2.27%	2,690		\$200,000
3	030-00-00-051.00	Hudson	18.41	Residential	2.10%	2.27%	1,275		\$45,000
4	030-00-00-050.00	Redmon	15.36	Residential	1.76%	2.27%	255		\$40,000
5	030-00-00-049.01	Shepherd	2.00	Residential	0.23%	2.27%	150		\$60,000
6	030-00-00-049.00	Wolford	4.00	Residential	0.46%	2.27%	580		\$8,000
7	030-00-00-045.02	Demoss	4.42	Residential	0.51%	2.27%	N/A		\$18,000
8	030-00-00-045.00	Stephens	19.28	Residential	2.20%	2.27%	1,095		\$170,000
9	030-00-00-044.00	Coffey	7.75	Residential	0.89%	2.27%	920		\$35,000
10	030-00-00-043.02	McGaha	9.56	Residential	1.09%	2.27%	1,050		\$30,000
11	030-00-00-042.00	McGaha	25.75	Agricultural	2.94%	2.27%	N/A		\$75,000
12	030-00-00-041.04	Crew	2.22	Residential	0.25%	2.27%	150		\$62,500
13	030-00-00-033.00	Goodin	3.00	Agricultural	0.34%	2.27%	225		\$75,000
14	030-00-00-031.00	Goodin	29.25	Agricultural	3.34%	2.27%	N/A		\$90,000
15	030-00-00-037.00	McQueary	71.50	Agri/Res	8.17%	2.27%	1,540		\$200,000
16	030-00-00-014.00	McGowan	139.96	Agri/Res	16.00%	2.27%	3,195		\$150,000
17	030-00-00-039.02	Foley	15.90	Residential	1.82%	2.27%	N/A		\$40,000
18	030-00-00-067.15	Burton	1.89	Residential	0.22%	2.27%	325		\$7,500
19	030-00-00-039.10	Edmonds	2.50	Commercial	0.29%	2.27%	N/A		\$37,250
20	030-00-00-039.07	Daniel	1.61	Residential	0.18%	2.27%	310		\$36,000
21	030-00-00-039.05	Goodin	2.59	Residential	0.30%	2.27%	N/A		\$19,500
22	030-00-00-041.01	Davis	0.58	Residential	0.07%	2.27%	180		\$38,000
23	030-00-00-066.13	Goodin	6.30	Residential	0.72%	2.27%	N/A		\$60,000
24	030-00-00-066.12	Foley	1.30	Residential	0.15%	2.27%	N/A		\$8,600
25	030-00-00-066.11	White	13.23	Residential	1.51%	2.27%	N/A		\$42,000
26	030-00-00-066.10	Faughn	1.00	Residential	0.11%	2.27%	N/A		\$8,100
27	030-00-00-066.09	Jimmerson	6.60	Residential	0.75%	2.27%	N/A		\$60,000
28	030-00-00-066.02	Jimmerson	4.74	Residential	0.54%	2.27%	235		\$180,000
29	030-00-00-015.01	Carey	7.48	Residential	0.86%	2.27%	415		\$85,000
30	031-00-00-011.00	Sullivan	18.23	Residential	2.08%	2.27%	840		\$150,000
31	031-00-00-010.00	Cooper	35.00	Agri/Res	4.00%	2.27%	655		\$220,000
32	031-00-00-033.00	Miller	12.50	Residential	1.43%	2.27%	1,020		\$60,000
33	031-00-00-032.02	Stephens	96.52	Agricultural	11.04%	2.27%	N/A		\$250,000
34	031-00-00-034.00	Hadley	8.08	Residential	0.92%	2.27%	650		\$31,000
35	031-00-00-034.01	McQueary	3.92	Residential	0.45%	2.27%	625		\$14,000
36	031-00-00-035.00	White	36.40	Agricultural	4.16%	2.27%	N/A		\$90,000
37	031-00-00-036.00	Tiller	66.28	Agri/Res	7.58%	2.27%	2,065		\$180,000
38	031-00-00-001.01	Coffey Trust	58.19	Agricultural	6.65%	2.27%	N/A		\$130,000
39	030-00-00-059.00	Robertson	48.37	Agri/Res	5.53%	2.27%	420		\$120,000
40	030-00-00-060.00	Passmore	2.80	Residential	0.32%	2.27%	310		\$13,000
41	030-00-00-063.01	Coppage	2.00	Residential	0.23%	2.27%	170		\$12,000
42	019-00-00-001.00	Kean	2.79	Residential	0.32%	2.27%	435		\$44,000
43	019-00-00-001.02	Corner	0.50	Residential	0.06%	2.27%	150		\$2,500
44	019-00-00-001.01	Shaw	0.48	Residential	0.05%	2.27%	150		\$12,000
Total			874.647		100.00%	100.00%	759		

Request No. 10: Provide a table showing (1) distances from the Project boundary in 100-foot intervals; (2) peak construction noise levels at that distance; including ALL construction activities and noise from vehicles; (3) the duration of that peak noise level at that distance (in days or weeks); and confirm that is assuming that all noise receptors surrounding the site at a distance of 200 feet would experience the same peak noise level for the same amount of time over the course of the construction period.

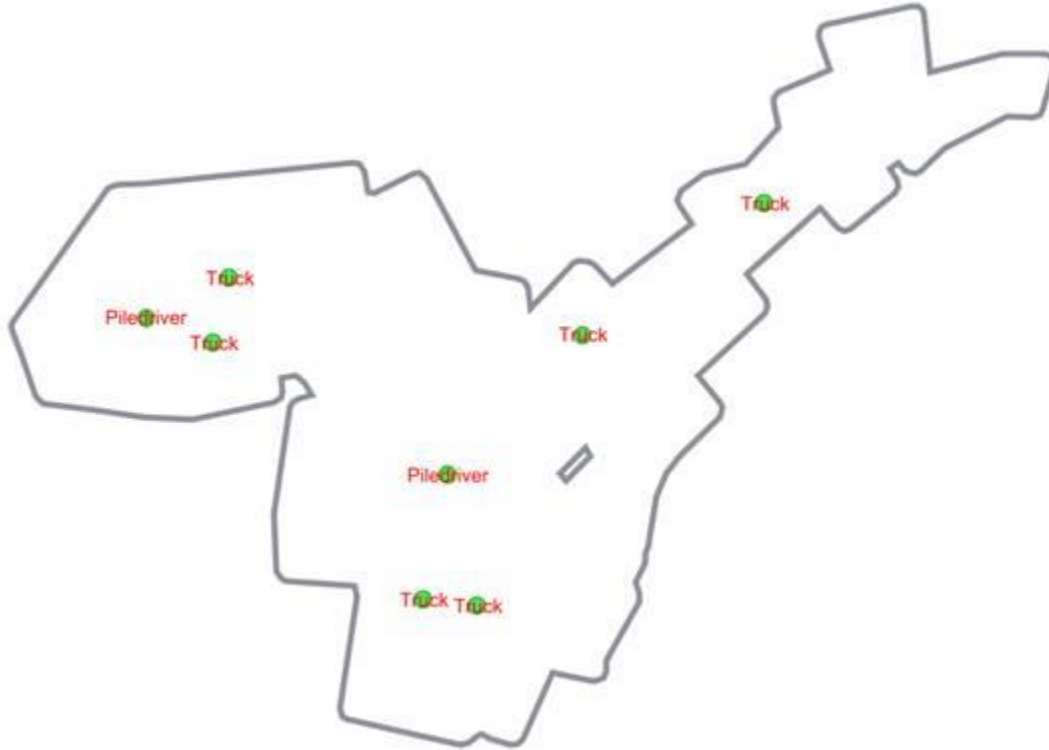
Response: The question assumes several variables as firm, which cannot be determined at this point. For instance:

- There is no “one construction noise level” for every discrete location. Construction noise level will vary based on varying equipment deployed during different phases of construction
- The quantity, exact type and time of deployment of machinery cannot be determined at this point.
- Noise emission will not be constant over time in each location, but different trades will move across the project site, hence exposing recipient to noise only during limited durations.

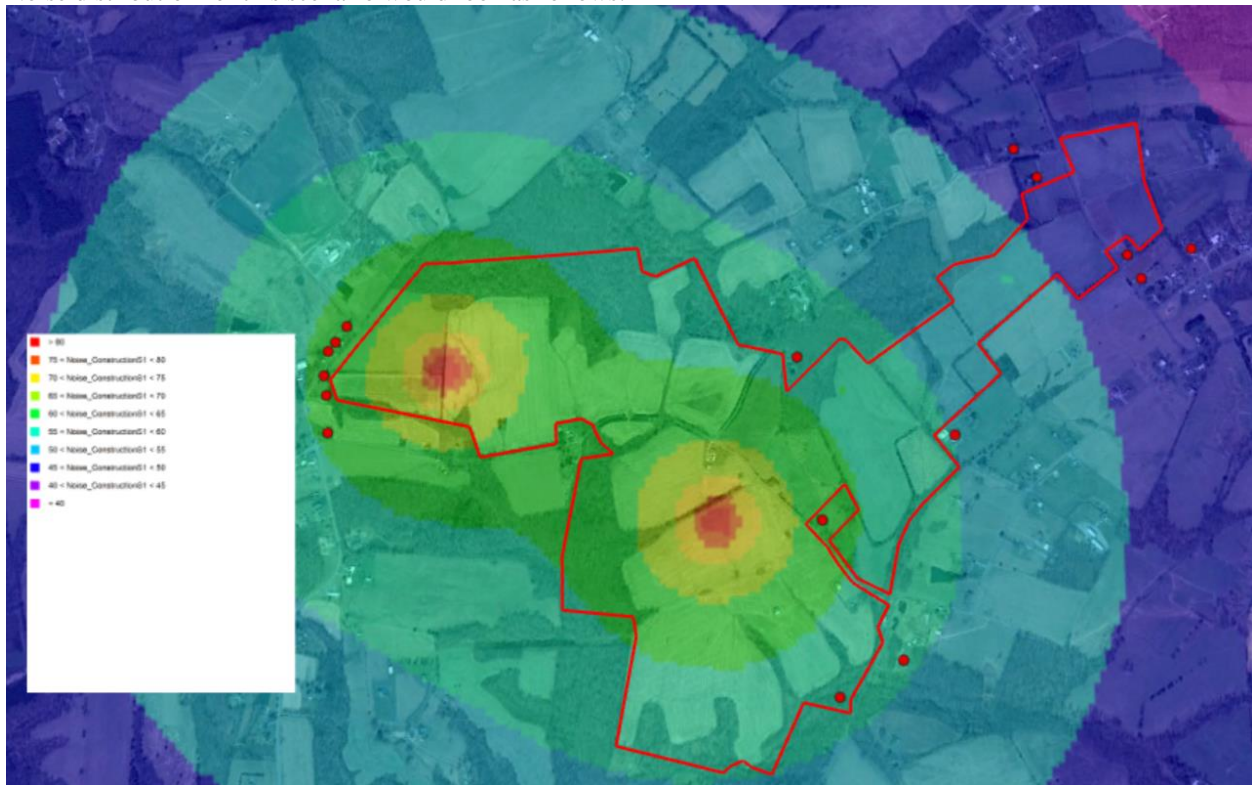
For illustrative purposes, the following two scenarios simulate noise levels in certain distances from the project with certain equipment deployed at the same time:

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Scenario 1: 2 pile-drivers (125dBA) and 6 trucks/excavators (85dbA) deployed at the same time:



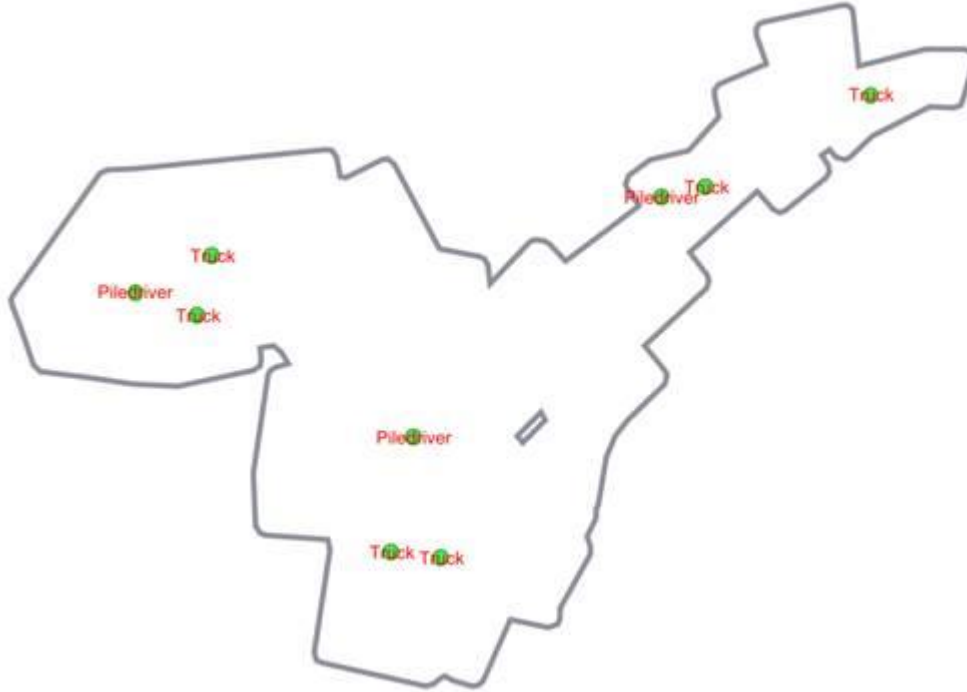
Noise distribution for this scenario would look as follows:



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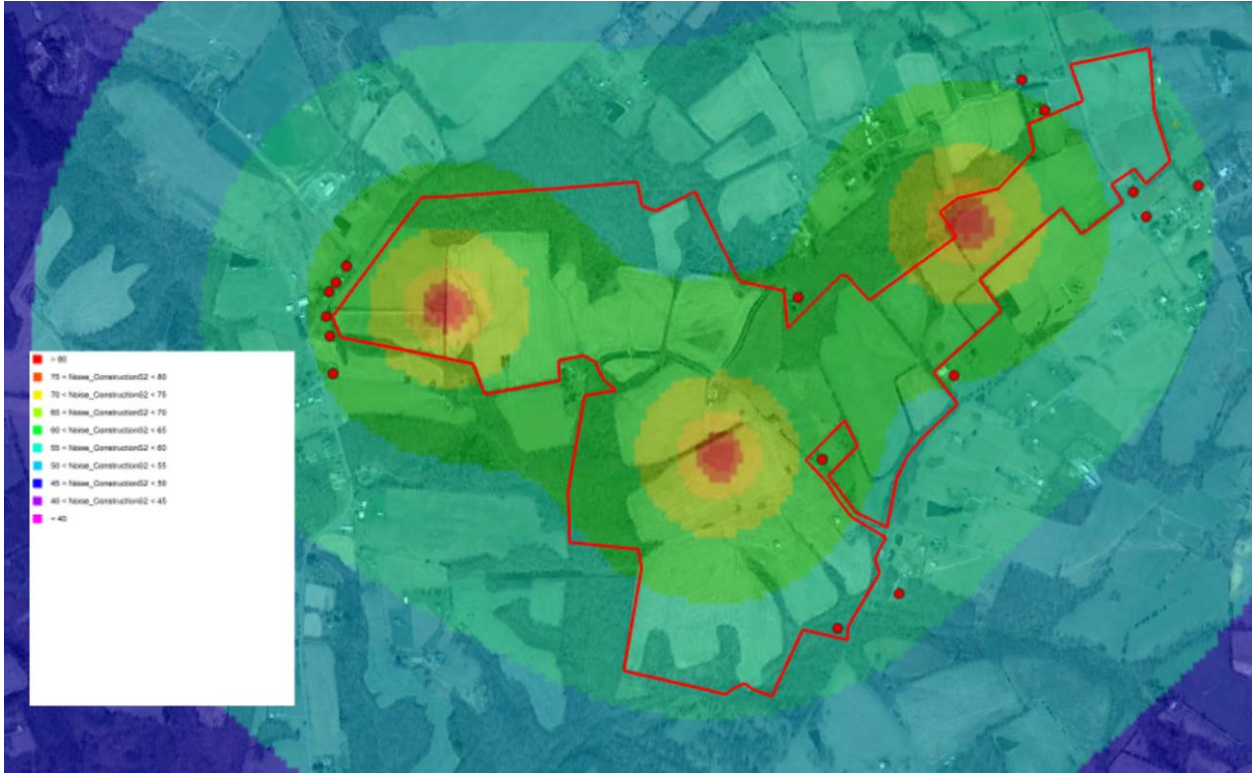
Distance from Project Boundary (ft)	Estimated Maximum Noise Level (dBA) with 2 x Piledrivers + 6 Trucks
100	64
200	63
300	62
5000	61
1000	59
1500	57

Scenario 2: 3 pile-drivers (125dBA) and 6 trucks/excavators (85dbA) deployed at the same time:



Noise distribution for this scenario would look as follows:

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These scenarios would result in the following noise levels at specific distances:

Distance from Project Boundary (ft)	Estimated Maximum Noise Level (dBA) with 3 x Piledrivers + 6 Trucks	Estimated Maximum Noise Level (dBA) with 2 x Piledrivers + 6 Trucks
100	75	64
200	72	63
300	69	62
5000	66	61
1000	62	59
1500	59	57

These scenarios are randomly selected and for illustrative purposes only. Number of pile drivers and trucks on site will be different and vary over time.

Responding Witness: Tyler Caron

Response No. 11: Refer to the response to Staff's First Request, Appendix Item VII.A.9. The response suggests that a package was hand delivered to one local church.

- a. Confirm any meetings or phone calls that have occurred with local church officials.
- b. There are two churches located to the south of the Project site along Sano Road. Explain whether the second church was contacted to discuss the Project.

Response:

- a. The only meeting or phone call that occurred with any local church official was on June 10, 2020, when Solomon Van Meter spoke with Tim Baker, Deacon of the Mt. Olive Missionary Baptist Church, an adjacent neighbor/landowner to the project. In that conversation Mr. Baker was informed about the project and the public meeting held August 6, 2020, and Mr. Van Meter offered to come to speak to the congregation (within COVID-19 guidelines). A package of materials, including a project map, was subsequently prepared and delivered to the church by Mr. Van Meter.
- b. No churches other than Mt. Olive Missionary Baptist Church are adjacent to the project area. No churches other than Mt. Olive Missionary Baptist Church were contacted to discuss the project.

Responding Witness: Benjamin Lindermeier

Request No. 12: Refer to the response to Staff's First Request, Appendix Items VII.B.2,3,4, and 5. The request was for a series of tables showing distances between ALL residential and non-residential structures, up to 2,400 feet from the Project inverters and from the substation. The response referred to the response provided to Staff First Request Items 8-10. However, that data only provides distances for the "five nearest" sound receptors. Given that the Noise and Traffic Study identifies 16 landowner residences within 300 feet of the Project footprint and the Property Value Impact Report lists 30 residences on adjacent properties:

- a. Provide a table showing the number of residential structures located within 300-foot intervals from the nearest inverter, from 0-300 feet up to 2,100-2,400 feet.
- b. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.) located within 300-foot intervals from the nearest inverter, from 0-300 feet up to 2,100-2,400 feet.
- c. Provide a detailed table showing the number of residential structures located within 300-foot intervals from the substation, from 0-300 feet up to 2,100-2,400 feet.
- d. Provide a detailed table showing the number of non-residential structures, by type of structure (i.e., church, school, commercial, barn, etc.) located within 300-foot intervals from the nearest substation, from 0-300 feet up to 2,100-2,400 feet.

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Response:

a.

Distance from Project Inverters (ft)	Number of Residential Structures	Number of Commercial Structures	Number of Barns and Other Outbuildings	Number of Churches
0-300	0	0	0	0
300-600	0	0	0	0
600-900	2	0	3	0
900-1200	7	0	11	0
1200-1500	7	0	16	0
1500-1800	16	0	20	0
1800-2100	13	1	26	1
2100-2400	17	2	27	1

b. See Response to subpart a.

c.

Distance from Project Substation (ft)	Number of Residential Structures	Number of Commercial Structures	Number of Barns and Other Outbuildings	Number of Churches
0-300	0	0	0	0
300-600	0	0	0	0
600-900	0	0	0	0
900-1200	0	0	0	0
1200-1500	0	0	0	0
1500-1800	3	0	3	0
1800-2100	0	0	0	1
2100-2400	2	0	6	0

d. See Response to subpart c.

Responding Witness: Tyler Caron

Request No. 13: Explain whether any measures be taken to reduce the view of construction equipment, workers or vehicles for adjacent landowners during the construction period.

Response: No measures will be taken specifically to reduce the view of construction equipment, workers or vehicles, though construction will take place in various places on the property so views of construction activities are likely to be shielded depending on the location of the adjacent landowners and the location of the construction activities.

Responding Witness: Benjamin Lindermeier

Request No. 14: Refer to the response to Staff's First Request, Appendix Item VIII.B, which states that "Locations for plantings of additional vegetative buffering have been determined based on existing vegetation and proximity to existing structures."

- a. Explain the specific criteria, in terms of (1) "existing vegetation" and (2) distance to structures that were used to evaluate the need for vegetative buffers.
- b. Explain whether the vegetative buffering was proposed to shield portions of Millerfield Road from view and to shield specific residences located within 150 feet of the Project boundary, which have limited existing vegetation.
- c. There are 16 residences located within 300 feet of the Project boundary and there may be others located at further distances, which have a view of the Project. Explain whether the view of the Project evaluated from each of those 16 nearby residences (or others) when developing the vegetative buffering plan.

Response:

- a. Existing vegetation was visually inspected from a standpoint of "sufficiently high" and "sufficiently dense" to shield the future project from a standing person's height. The determination is based on a visual inspection from different points of view between structures and future project location.
- b. The vegetative buffer proposed along Millerfield Rd was designed to shield as much of the roadway as possible from visual impacts from Mt Olive Creek Solar, as well as homes nearest to the Project along that section of road. Considerations were taken to ensure as much of the Project was screened as possible.
- c. Mt Olive Creek made an effort to analyze the viewshed from many different points and directions with an emphasis on residences in the immediate vicinity of the project. Due to

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existing tree lines that will be preserved and changes in elevation, it is believed that most if not all residences located outside the immediate vicinity will not have a view of the project.

Responding Witness: Benjamin Lindermeier

Request No. 15: Explain whether property owners adjacent to Project boundaries were consulted when developing the plan for and identifying locations for proposed vegetative buffers.

- a. If yes, describe that process and landowner inputs led to the proposed vegetative barriers identified in Attachment A of the SAR (Preliminary Project Layout).
- b. If no, explain the plan to coordinate with adjacent landowners to specifically discuss potential visual impacts and mitigation strategies.

Response: Solomon Van Meter met with certain landowners adjacent to the project area. In those meetings vegetative screening of the project was discussed, among other issues. The "process" of incorporating landowner inputs for vegetative buffering into the site plan was ad hoc, in that these meetings were part of the overall outreach for the project. The extent to which any particular landowner's input led to vegetative buffer enhancements or changes varied depending on the extent of the viewshed impact of the project on a particular property. However, most, if not all, landowner suggestions and concerns that came to light from these meetings with landowners were incorporated into the vegetative buffer plan for the project. Although meetings with landowners were limited because of COVID-19, those included meetings with the following adjacent landowners: Victor & Shirley Cooper, Gary Robertson, Walter & Jackie Adamson, Beth & Jeremy Snead, the Coopage family (Jonathan Oaks), Kim & Dale Carey, Glen Sullivan, and Barry Burton.

Responding Witness: Benjamin Lindermeier

Request No. 16: Refer to the response to Staff's First Request, Appendix Item II.K, that states Mt. Olive Creek has entered into two purchase and sale agreements. The response to Staff's First Request, Appendix Item IX.B, states that one of those purchases was with a landowner that would have been surrounded by the Project.

- a. Explain whether that transaction the purchase of the property identified as Residence C on the Map of Nearest Neighbors (Attachment C of the SAR).
- b. If yes, explain whether the vegetative buffer located along Sano Road in the vicinity of that residence still be developed.
- c. If not, provide a revised map of the final locations of the proposed vegetative buffers.

Response:

- a. No, residence C is not a property being purchased by the Project. See the attached clarifying map for the property that will be purchased that would have been surrounded by the project.
- b. The vegetative buffer will be installed in accordance with the proposed site plan.
- c. The vegetative buffer will be installed in accordance with the proposed site plan.

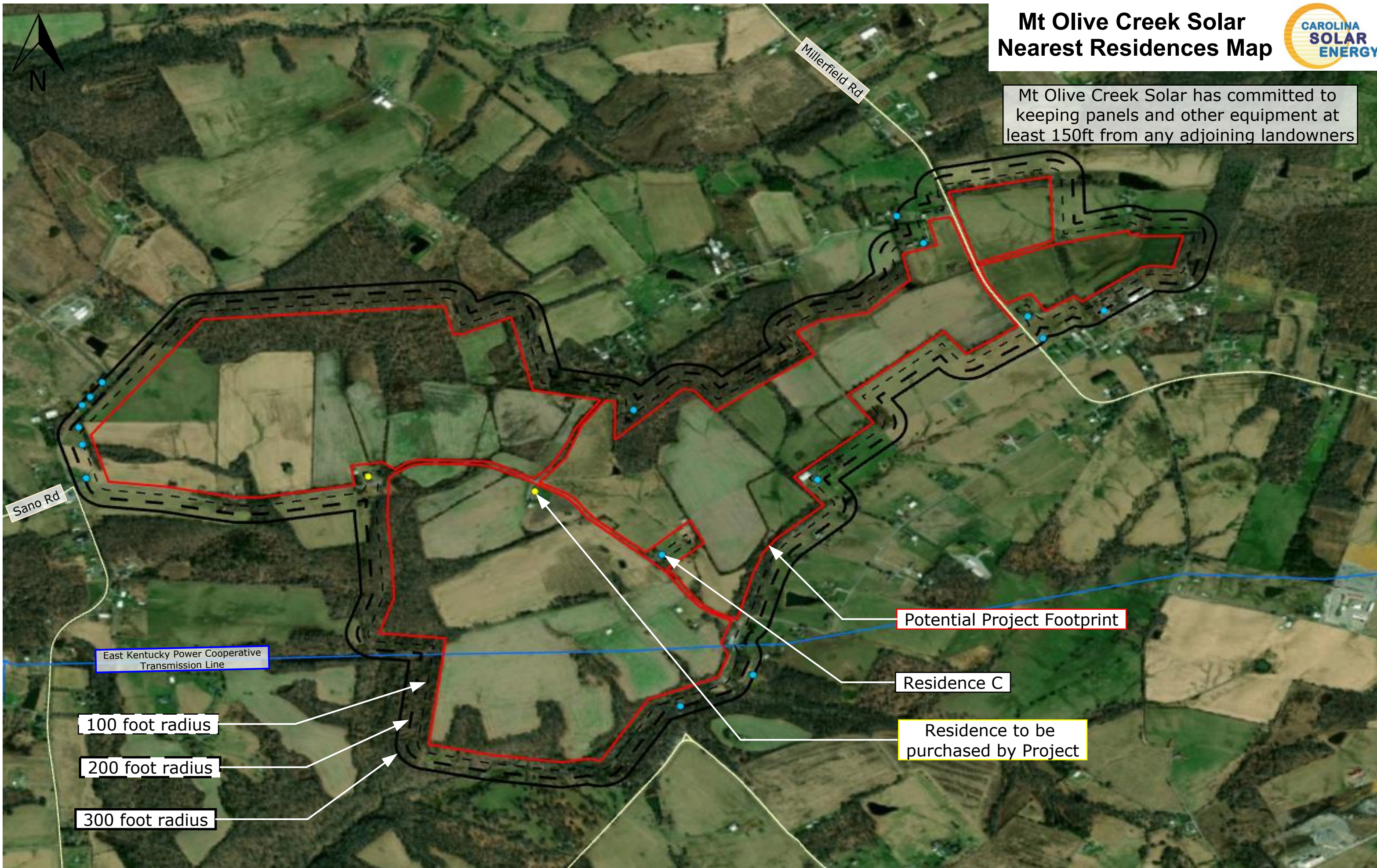
Responding Witness: Benjamin Lindermeier



Mt Olive Creek Solar Nearest Residences Map



Mt Olive Creek Solar has committed to keeping panels and other equipment at least 150ft from any adjoining landowners



Sano Rd

Millerfield Rd

East Kentucky Power Cooperative
Transmission Line

Potential Project Footprint

Residence C

Residence to be
purchased by Project

100 foot radius

200 foot radius

300 foot radius

Request No. 17: Refer to the response to Staff's First Request, Appendix Items VIII.B.14 and 15, that state that local drivers and residents will not experience any glare from the operations of the panels:

- a. Confirm that a glare study for this location has not been completed and provide a basis for this conclusion.
- b. Confirm that anti-glare panels will be used and that measures will be taken to reduce glare.
- c. Explain any commitment to eliminating any glare issues that might occur for local residents and drivers.
- d. Explain if glare issues arise, whether Mt. Olive Creek is willing to change panels, modify or cease operations until the glare issue is resolved.

Response:

- a. Confirmed. Anti-glare panels will be used.
- b. Confirmed.
- c. Glare has not been an issue on similar projects, but any complaints regarding glare will be handled on an ad hoc basis.
- d. If glare issues arise, Mt Olive Creek Solar is willing to consider a variety of mitigating actions, depending on the location of the glare and the severity of the glare.

Responding Witness: Benjamin Lindermeier

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Request No. 18: Refer to the response to Staff's First Request, Appendix Item IX.C. Provide the recordings and chat logs for both public meetings.

Response: Due to the size and nature of these files, and after consultation with counsel for the Siting Board, the responsive information is being provided via a USB drive that should arrive at the Siting Board no later than August 4, 2021. A motion to deviate from the filing procedures will accompany this response.

Responding Witness: Tyler Caron

Request No. 19: Refer to the response to Staff's First Request, Appendix Item IX.E.

- a. Provide the name of the entity responsible for maintaining the cemetery on Sano Road.
- b. Explain whether that entity has been contacted specifically to discuss the Project in that area.

Response:

- a. The cemetery is located on the property of Earl Bennett.
- b. Mt. Olive Creek Solar, LLC, does not have any knowledge of what, if any, entity, other than Earl Bennett, that is responsible for maintaining the cemetery. Mr. Bennett is a participating landowner and will be consulted regarding the cemetery prior to commencing construction.

Responding Witness: Benjamin Lindermeier

Request No. 20: Refer to the response to Staff's First Request, Appendix Item IX.F.

- a. Explain how individual complaints will be addressed during construction and operations.
- b. Describe the process for resolving complaints with local landowners.

Response:

- a. Mt Olive Creek will have full-time representation on site during construction via our Construction Monitoring team, led by the Construction Monitoring Manager (CMM).
- b. Any issues or complaints can be brought to the attention of the CMM. The CMM may be able to deal with the issue/concern themselves immediately, it really depends on the nature of it. If it can't be addressed then and there, the CMM will report back to the Project Manager who will pull in the appropriate party(ies) (Development, Legal, PR, etc.) depending on the specifics of the issue.

Responding Witness: Benjamin Lindermeier

Request No. 21: Refer to Attachment E of the Application. Confirm what church was approached by Mt. Olive Creek and clarify whether it was Mt. Olive Missionary Baptist Church, Sano Baptist church or the Church of God.

Response: The only church contacted by Mt. Olive Creek Solar, LLC, regarding the project was Mt. Olive Missionary Baptist Church.

Responding Witness: Benjamin Lindermeier

Request No. 22: Refer to the response to Staff's First Request, Item 1, and to the response to Staff's First Request, Appendix Item XI.B. Explain what portion of the construction workforce (and the total jobs) will be filled by LOCAL (Russell County) residents.

Response: Mt Olive Creek Solar intends to hire as many Russell County residents as possible. Total local hires and proportion of workforce will be determined entirely by the amount of qualified local job applicants.

Responding Witness: Benjamin Lindermeier

Request No. 23: Refer to the response to Staff's First Request, Item 1, and to the response to Staff's First Request, Appendix Item XI.B1 (Table 1), that indicates generation of 191.4 jobs when considering Russell County only. Explain that number as compared with the estimate of 199 new jobs in the County stated in the Economic Report.

Response: Both numbers are estimates. As explained in the response to Staff's Request for Information #1, the figure provided in Table 1 incorporates an additional year of county-level economic data.

Responding Witness: Benjamin Lindermeier

Request No. 24: Refer to the response to Staff's First Request, Item 4, that includes a table of indirect and induced spending in Russell County (top 30 industries), as associated with local construction spending.

- a. Describe the assumed amount of direct construction spending that will occur in Russell County vs. expenditures for equipment, etc. procured outside the County.
- b. Explain the estimated amount of total spending (direct, indirect, induced) in all industries stemming from construction activity that will occur in Russell County.
- c. Explain whether the data provided above include labor costs, as well as materials, supplies and equipment.

Response:

- a. The IMPLAN model of Russell County predicts that direct construction spending in the County, as associated with the 150 direct jobs, will be \$18.3 million. The remainder of the direct spending will be for equipment and services supplied from outside the County.
- b. The IMPLAN model of Russell County predicts that total spending impact (including spinoff activity) from construction spending in the County, will be \$18.1 million.
- c. Yes, the spending impacts include the labor costs of \$7.5 million.

Responding Witness: Paul Coomes

Request No. 25: Describe the types of materials, supplies, equipment that will be purchased in Russell County in support of facility construction.

Response: Mt Olive Creek Solar prefers to procure supplies and equipment from local suppliers, where they are competitively priced. General materials include gravel, concrete and fencing.

Responding Witness: Benjamin Lindermeier

Request No. 26: Provide the total estimated economic output generated by Project construction within the Commonwealth of Kentucky.

Response: Mt Olive Creek constructed an IMPLAN model of the state of Kentucky, and simulated the 150 construction jobs associated with this project. The model predicts that the total construction-related spending will result in new Output of \$24.6 million in the state.

Responding Witness: Paul Coomes

Request No. 27: Describe the types of materials and supplies that will be purchased in Russell County to support Project operations.

Response: Supplies purchased during the operational phase of the project would be mainly related to vegetation management, project road maintenance, and janitorial services. Goods might include food, fuel, office supplies, tools, small hardware parts. Other services might be related to trash removal, and panel cleaning if necessary.

Responding Witness: Benjamin Lindermeier

Request No. 28: Confirm an estimate of \$90 to \$120 million investment made by the Mt. Olive Creek Solar, is only a small portion of what will be spent in Russell County and what percentage of that will be labor costs.

Response: Labor cost typically accounts for a significant percentage of the overall EPC cost (less modules). \$40MM-45MM range for EPC, and about 15-20% should be labor. Of that, a significant portion will be local labor. Breakdown of cost for a comparable project below:

- Labor – 13.8%
- Construction Equipment – 9.2%
- Permanent Materials – 48.8%
- Subcontractors – 17.0%
- Other – 11.2%

Responding Witness: Benjamin Lindermeier

Request No. 29: Refer to the response to Staff's First Request, Item XI.E, that states that PILOT payments "will be allocated among the Ambulance District, the County, the Extension District, the Hospital District, the Library District, the Public Health Taxing District, the School District and the Soil Conservation District. The allocation will be made pro rata based on each districts respective tax rate." Provide estimates of the amount of the PILOT payments distributed to each District based on "each district's respective tax rate", for:

- a. Years 1 through 20.
- b. Years 21 through 40.

Response:

The 2020 property tax rates for Russell County are attached. Each taxing district's proportionate share based on these rates follows:

- Ambulance District – 7.64%
- County – 7.64%
- Extension District – 4.33%
- Hospital District – 7.53%
- Library District – 7.18%
- Public Health Taxing District – 5.13%
- School District – 59.52%
- Soil Conservation District – 1.03%

These percentages are multiplied by the PILOT rate per MW multiplied by the number of installed MWs to determine the amount each receives. These percentages can change from year-to-year as the Fiscal Court and School Board establish new tax rates.

Responding Witness: Brian Zoeller

2020 Tax Year

RUSSELL COUNTY 104

TDID	TD TYPE	TAXING JURISDICTIONS	REAL ESTATE	TANGIBLE PERSONAL	MERCHANTS INVENTORY	DOCUMENTED WATERCRAFT	PERSONAL AIRCRAFT	INVENTORY IN TRANSIT
104001	COUNTY	AMBULANCE	6.7000	9.2000	9.2000	9.2000	9.2000	0.0000
104002	COUNTY	EXTENSION SERVICES	3.8010	6.3173	6.3173	6.3173	0.0000	0.0000
104003	COUNTY	GENERAL FISCAL COURT	6.7000	9.2000	9.2000	9.2000	9.2000	0.0000
104004	COUNTY	HEALTH	4.5000	4.5000	4.5000	4.5000	4.5000	4.5000
104005	COUNTY	HOSPITAL	6.6000	9.2000	9.2000	9.2000	9.2000	0.0000
104006	COUNTY	LIBRARY	6.3000	7.6100	7.6100	7.6100	7.6100	7.6100
104007	COUNTY	SOIL CONSERVATION	0.9000	0.0000	0.0000	0.0000	0.0000	0.0000
COUNTY WIDE TOTAL			35.5010	46.0273	46.0273	46.0273	39.7100	12.1100
104009	SCHOOL	GENERAL RUSSELL COUNTY	52.2000	52.2000	52.2000	52.2000	52.2000	0.0000
104010	CITY	JAMESTOWN	17.9000	17.9000	17.9000	17.9000	17.9000	0.0000
104011	CITY	RUSSELL SPRINGS	16.3000	16.3000	16.3000	16.3000	16.3000	0.0000

OTHER PROPERTY RELATED TAXES

TIMBERLAND FIRE PROTECTION 2.0 CENTS PER ACRE

Request No. 30: Refer to the response to Staff's First Request, Item XI.E, that also states, "If the allocation to the School District results in the School District receiving an amount less than the amount of property taxes it would have received from the Company if the bonds had not been issued, the Company will make an additional payment to the School District in the amount of such shortfall."

- a. Provide information about the amount of current property tax going to the School District, as specifically associated with the properties included in the Project.
- b. Explain whose responsibility it is to make the calculation of the difference between property taxes going to the School District with and without the Industrial Revenue Bond and whether Mt. Olive Creek will be working with the County to monitor that.
- c. Explain the approach to be taken for other applicable taxing Districts.

Response:

- a. In 2019, approximately \$2,000 in total was paid in property taxes on all parcels in the project as this was primarily farmland during such year. Assuming the relative percentages set forth in the response to Request No. 29 applied to 2019, the school district received approximately \$1,200 in 2019. The applicant does not have current property tax bills for 2021 to use for this analysis, but it is reasonable to assume there has not been a material change since 2019.
- b. The Company will make the determination of such difference based on the value of the property as determined by the Property Value Administrator for Russell County. Additionally, the School District will have appeal rights pursuant to the terms of the PILOT agreement.
- c. The other taxing districts will only receive their respective pro rata share of the PILOT payment as described in the answer to Request No. 29 and no other calculations are required.

Responding Witness: Brian Zoeller

Mt. Olive Creek, Solar, LLC
Response to Siting Board's Second Request for Information
Case No. 2020-00226

Request No. 31: Confirm that the decommissioning plan applies to all properties within the Project site, including both leased properties and purchased properties.

Response: Confirmed.

Responding Witness: Benjamin Lindermeier