# Flat Run Solar, LLC Kentucky State Board on Electric Generation and Transmission Application

Application Documents Case No. 2020-00272 April 2021



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## **1. Applicant Information**

<u>REQUIREMENT</u>: per KRS 278.706(2)(a); *The name, address, and telephone number of the person proposing to construct and own the merchant electric generating facility* 

<u>COMPLIANCE</u>: Please see below for the requested information.

- Name: Flat Run Solar, LLC
  Attn: Carson Harkrader
- Address: 400 W Main St Suite 503 Durham, NC 27701
- Phone: (919) 682-6822

## 2. Description of Proposed Site

<u>REQUIREMENT</u>: per KRS 278.706(2)(b); A full description of the proposed site, including a map showing the distance of the proposed site from residential neighborhoods, the nearest residential structures, schools, and public and private parks that are located within a two (2) mile radius of the proposed facility

<u>COMPLIANCE</u>: The proposed Flat Run Solar Facility (the Project) will be a 55-megawatt alternating current (MWac) photovoltaic electricity generation facility. The Project is to be located in Taylor County, near the unincorporated community of Saloma. The power generated by the Project will be sold on the open market through an existing transmission line that crosses the property.

A map showing the location of residential structures, schools, and public and private parks in relation to the proposed project is located in Attachment A. There are no schools, public or private parks within 2 miles of the Project's radius, and there are 3 residential neighborhoods (per KRS 278.701(6)) within 2,000 feet of the Project's radius.

The Project will be built on up to 450 acres which has historically been used as pasture and crop land. The equipment onsite will consist of crystalline solar panels, racking, inverters, transformers, a DC-coupled energy storage system, one substation transformer, and associated wiring and balance of system.

The racking system used to fix the solar panels to the ground has a small footprint that does not use concrete, and the panels are generally not considered impervious as rainwater can travel over and around the panels, making this a low impact development. The panels and racking are no more than 15 feet high at the highest point. The racks will be placed directly onto grass. Gravel will be placed on the access roads throughout the site, and will not be placed under the solar panels.

A video showing the process for solar pile installation onto grass can be found at: <u>https://www.youtube.com/watch?v=5bE9XexB4yM</u>. This video is representative of the pile driving installation method that will be used at Flat Run. Note that the configuration of the racks and panels on the piles will be somewhat different at Flat Run than the technology shown in this video. The video shows fixed-tilt racks, whereas Flat Run will use single axis tracking racks which will rotate slowly to track the sun's path from East to West one time throughout each day. Also, at Flat Run no members of the public will be inside the security fence; this video shows an industry demonstration event where members of the public were able to walk near the installation to view the process.

A fence meeting the National Electric Safety Code requirements, typically a six-foot fence with three strings of barbed wire at the top, will enclose the facility and will be installed before the

start of construction. The Project will comply with the NESC and American National Standards Institute (ANSI) Z535 Safety Sign Standards for Electric Utility Power Plants and Substations to guide the placement of safety signage around the facility.

Applicant proposes sections of vegetative buffers to help screen the view of the facility from sections of the roads surrounding the Project that do not have existing vegetation to block the view of the Project. The vegetative buffer will consist of two staggered rows of evergreen shrubs that have a mature height of approximately 15 feet. The rows will be spaced approximately 15 feet apart, and the shrubs will be at least three feet in height at time of planting. See the site plan, Attachment A of the Site Assessment Report, for the proposed location of the vegetative buffers. Please also see Attachment B of this application for reference images of vegetative buffers installed at operating solar facilities. The images depict vegetative buffers, security fencing, and solar panels similar to the configuration proposed at Flat Run.

At least 2 acres of native pollinator species will be planted on the Project site, likely within the setback area as marked on the site plan map in Attachment A of the Site Assessment Report. Pollinating insects are in decline across the US, and pollinator plantings at solar facilities like Flat Run can support healthy local populations of pollinators.<sup>1</sup> Healthy pollinator populations are essential for certain agricultural crops including soybeans, and the US Department of Agriculture estimates that 35 percent of the world's food crops depend on animal pollinators to reproduce.<sup>2</sup>

There are 2 types of inverters commonly used on solar facilities; central inverters and string inverters. Central inverters are typically located towards the interior of the solar farm, and there is usually 1 central inverter per few dozen rows of solar panels. String inverters are smaller units that are typically attached to the end of each row of solar panels. At the time of this application the Project has not committed to using one or the other technology, and will make this decision prior to construction. If central inverters are used, there will be approximately 13 central inverters in the facility.

The energy storage systems are typically housed in a structure similar to a shipping container. HVAC systems are used to cool the energy storage equipment, and are housed on the outside of the energy storage system structure. There will be approximately 13 energy storage container areas in the facility. The energy storage units are typically located in central locations throughout the site, co-located with central inverters, if central inverters are used.

The site plan and information about the equipment that will be used in the Project were presented to the public through various means throughout the Project's public outreach efforts, as described in Section 6 of this Siting Board Application.

<sup>&</sup>lt;sup>1</sup> https://www.scientificamerican.com/article/solar-farms-shine-a-ray-of-hope-on-bees-and-butterflies/

<sup>&</sup>lt;sup>2</sup> https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/plantsanimals/pollinate/

## **3. Public Notice Evidence**

<u>REQUIREMENT</u>: per KRS 278.706(2)(c); Evidence of public notice that shall include the location of the proposed site and a general description of the project, state that the proposed construction is subject to approval by the board, and provide the telephone number and address of the Public Service Commission. Public notice shall be given within thirty (30) days immediately preceding the application filing to:

- 1. Landowners whose property borders the proposed site; and
- 2. The general public in a newspaper of general circulation in the county or municipality in which the facility is proposed to be located

<u>COMPLIANCE</u>: A sample of the notice of application letter that was sent to landowners whose property borders the proposed site, followed by the list of addresses and names of those landowners who were sent notices on March 12, 2021 is contained in Attachment C. Two copies of this notice were mailed to each landowner; one via regular US Mail and one via USPS Certified Mail. Please see Attachment C for certified mail receipts.

Also contained in Attachment C is the affidavit of publication of the notice published in the Central Kentucky News-Journal on March 11, 2021, which is the newspaper of general circulation in Taylor County, as well as a copy of that notice.

A map of the adjacent neighbors, along with a list of each adjacent parcel's ownership, is included in Attachment B to the Site Assessment Report.

### 4. Compliance with Local Ordinances and Regulations

<u>REQUIREMENT</u>: per KRS 278.706(2)(d); A statement certifying that the proposed plant will be in compliance with all local ordinances and regulations concerning noise control and with any local planning and zoning ordinances. The statement shall also disclose setback requirements established by the planning and zoning commission as provided under KRS 278.704(3)

<u>COMPLIANCE</u>: The Project lies entirely in Taylor County. There are no setback requirements established by a planning and zoning commission for the location of the project, and no noise ordinance that applies to the Project. A letter from Taylor County Judge Executive Barry Smith confirming the lack of planning and zoning and noise ordinance is submitted as Attachment D.

Applicant certifies that the Project will follow any applicable local ordinances and regulations concerning noise control, and with any applicable local planning and zoning ordinances. A statement certifying these facts is included in Attachment E.

## **5. Setback Requirements**

<u>REQUIREMENT</u>: per KRS 278.706(2)(e); *If the facility is not proposed to be located on a site of a former coal processing plant and the facility will use on-site waste coal as a fuel source or in an area where a planning and zoning commission has established a setback requirement pursuant to KRS 278.704(3), a statement that the exhaust stack of the proposed facility and any wind turbine is at least one thousand (1,000) feet from the property boundary of any adjoining property owner and all proposed structures or facilities used for generation of electricity are two thousand (2,000) feet from any residential neighborhood, school, hospital, or nursing home facility, unless facilities capable of generating ten megawatts (10MW) or more currently exist on the site. If the facility is proposed to be located on a site of a former coal processing plant and the facility will use on-site waste coal as a fuel source, a statement that the proposed site is compatible with the setback requirements provided under KRS 278.704(5). If the facility is proposed to be located in a jurisdiction that has established setback requirements pursuant to KRS 278.704(3), a statement that the proposed site is in compliance with those established setback requirements:* 

<u>COMPLIANCE</u>: Flat Run Solar is not proposed to be located on the site of a former coal processing plant, nor will it use any waste coal as a fuel source. The Project site does not have any existing electricity generating facilities on-site. Taylor County does not have established setback requirements for this location, nor has a planning unit enacted any setback requirements for this location provided in Section 4 above.

The Project will not include any exhaust stacks or wind turbines as part of the facility, therefore there is no established 1,000 foot setback requirements from the property boundary of any adjoining property owner to the energy generating facilities.

There are three residential neighborhoods (as defined by KRS 278.700(6)) within two thousand (2,000) feet of the Project. Pursuant to KRS 278.704(4), Flat Run Solar will be moving the Siting Board for a deviation from this setback requirement. See Attachment A for a map showing the residential neighborhoods in relation to the Project. More information about the neighborhoods will be provided in Applicant's motion for deviation.

## **6. Public Notice Report**

<u>REQUIREMENT</u>: per KRS 278.706(2)(f); A complete report of the applicant's public involvement program activities undertaken prior to the filing of the application, including:

1. The scheduling and conducting of a public meeting in the county or counties in which the proposed facility will be constructed at least ninety (90) days prior to the filing of an application, for the purpose of informing the public of the project being considered and receiving comment on it;

2. Evidence that notice of the time, subject, and location of the meeting was published in the newspaper of general circulation in the county, and that individual notice was mailed to all owners of property adjoining the proposed project at least two (2) weeks prior to the meeting; and

3. Any use of media coverage, direct mailing, fliers, newsletters, additional public meetings, establishment of a community advisory group, and any other efforts to obtain local involvement in the siting process

<u>COMPLIANCE</u>: Flat Run Solar, LLC, through its parent Carolina Solar Energy III, LLC (collectively, "Carolina Solar Energy"), has made a substantial effort to engage the public in numerous ways regarding the Project.

Representatives of Carolina Solar Energy first reached out to Taylor County Judge/Executive Barry Smith in September 2019, and met in person to introduce Carolina Solar Energy and to let him know about the location of the Project. Ron McMahan, Executive Director of the Taylor County Economic Development Authority, attended an introduction to solar energy facilities presented by solar companies including Carolina Solar Energy, which took place in Marion County in October of 2019; Judge/Executive Smith was not able to attend this meeting. Attachment F outlines our additional community engagement to date.

In addition to our public outreach and notices, a detailed article about the Project ran in the Central Kentucky News-Journal on September 24, 2020. The article is provided in Attachment G and includes a large color image of the site layout map.

Due to the COVID-19 pandemic and in compliance with Kentucky Governor Andy Beshear's Executive Order, dated March 18, 2020, and subsequent executive orders, the public meeting for the Project was held virtually. The Project filed a Motion for Approval of Form of Public Meeting with the Siting Board, dated August 25, 2020, setting forth a plan to hold the public meeting online. The Siting Board issued an order dated August 28, 2020, approving a virtual public meeting and setting forth additional requirements for the public meeting.

The public meeting was held via Zoom at 5:30pm CDT on September 17, 2020, with an in-person screening option. The meeting consisted of a prerecorded video describing the project and solar technology, followed by a question and answer period where attendees, both virtual and in person, could ask questions to the panel, who all attended virtually via Zoom. The physical portion of the meeting was held at the Lake Cumberland Area Development District Kentucky Career Center-Campbellsville, 1311-C East Broadway, Campbellsville, KY 42718.

At the public meeting there were no concerns raised by neighbors or by the community about the Project, and as of the date of this application, Flat Run has not received complaints or concerns from neighbors of the Projector by the community outside of the public meeting.

In addition to holding the public meeting, Carolina Solar Energy displayed a large 24x36" printed copy of the layout map of the solar project on an easel at the entrance to the Taylor County Courthouse for the 3 business days prior to the public meeting, together with a copy of the public notice about the public meeting providing instructions on how to register and attend.

A notice announcing the public meeting was printed in the Central Kentucky News-Journal on September 3, 2020. The Project also mailed letters, dated June 26, 2020, to all adjoining landowners notifying them of the virtual meeting, and providing instructions on how to reserve a spot at the physical screening of the public meeting.

Attachment H provides the affidavit of publication for this notice, a copy of the newspaper notice, and a copy of the letter sent to neighboring landowners.

The prerecorded video shown at the public meeting included presentations from four representatives of Carolina Solar Energy and experts in solar energy, as well as a drone flyover video of a similarly-sized utility scale solar project, with verbal explanation of each component of the project. The video is available on the Carolina Solar Energy website for the Project, https://www.carolinasolarenergy.com/projects-in-development-source/flat-run, and the letters advising adjacent neighbors of the public meeting included a website link to the page that includes the video and other information about the project, including the site plan, real estate impact report, and a fact sheet.

The representatives of Carolina Solar Energy and experts in solar energy who were in the video and also present remotely at the Zoom video conference are listed below, with a description of the topics each person covered:

 Carson Harkrader, CEO of Carolina Solar Energy, made welcome and introductory comments about the project and presentation, explained why this solar project is being proposed in Taylor County, and discussed local benefits such as real estate taxes and construction jobs.

- Christopher Jones, Project Manager, discussed the components that make up a solar farm, showed a single solar panel from all angles, discussed the site plan, and narrated the drone flyover of an existing solar project.
- Chris Sandifer, a professional engineer who has decades of experience working for both utilities and solar companies interconnecting solar projects and other energy projects, made statements related to solar technology and health and safety concerns around solar farms.
- Rich Kirkland, licensed real estate appraiser registered in Kentucky, discussed his research on utility scale solar and neighboring residential property values.

After the public meeting held on September 17, 2020, Carolina Solar Energy signed a new lease agreement for up to 25 acres with one additional landowner whose property was not included in the site layout shown at the public meeting. This new landowner's parcel is shown on the map attached as Attachment I, which includes parcel lines showing the surrounding properties. A copy of the site layout map that was presented at the public meeting and displayed in the Fiscal Court entrance in September 2020, which did not include the new parcel, is attached as Attachment J.

As is shown on Attachment I, the new parcel does not add any new neighboring parcels to the Project because it is bound to the West and North by a Tennessee Gas facility that was already a neighbor of the Project, and to the South and East by other parcels that are part of the Project. The new parcel effectively filled in a "donut hole" between the Tennessee Gas facility and the prior project footprint.

As the only adjoining neighbor to the new parcel, Applicant requested confirmation from Tennessee Gas that the addition of the new parcel was acceptable to them and that they were satisfied by the notice they received of the Project prior to the public meeting. A letter from Tennessee Gas confirming this is attached as Attachment K.

### 7. Efforts to locate near Existing Electric Generation

<u>REQUIREMENT</u>: per KRS 278.706(2)(g); A summary of the efforts made by the applicant to locate the proposed facility on a site where existing electric generating facilities are located;

<u>COMPLIANCE</u>: It is rare for utility-scale solar projects to be co-located with existing electricity generating infrastructure, such as a coal or natural gas fired power plant. Efforts were made to site the Project where there is existing electricity transmission infrastructure.

The project will interconnect to an on-site, existing transmission line owned by East Kentucky Power Cooperative (EKPC). At the project's expense, EKPC will build a new tap line to interconnect the Project.

## 8. Proof of Service to County and Municipality Officials

<u>REQUIREMENT</u>: per KRS 278.706(2)(h); Proof of service of a copy of the application upon the chief executive officer of each county and municipal corporation in which the proposed facility is to be located, and upon the chief officer of each public agency charged with the duty of planning land use in the jurisdiction in which the facility is proposed to be located;

<u>COMPLIANCE</u>: A copy of the Siting Board application for Flat Run Solar, LLC was electronically transmitted to the Judge/Executive of Taylor County, Barry Smith, on the date of electronic filing of this application. On inquiry by Flat Run, Judge Smith indicated that he would accept an electronic copy of the application, with a paper copy mailed to him separately after the electronic application.

### 9. Effect on Kentucky Electricity Generation System

<u>REQUIREMENT</u>: per KRS 278.706(2)(i); An analysis of the proposed facility's projected effect on the electricity transmission system in Kentucky;

<u>COMPLIANCE</u>: The Project will inject renewable electricity generated by the sun into the electricity transmission system in Kentucky. This project also includes an option for a dc-coupled energy storage system, which if implemented, is designed to store excess electricity generated by the solar panels during the day, in order to supply it to the grid at other times. The energy storage system will also likely assist with providing capacity resources and other auxiliary services to the transmission grid such as frequency regulation. The dc-coupled energy storage system is included within the Project's interconnection applications, but can be removed without penalty if it is not considered economically feasible.

The Project is located within the territory of PJM Interconnection LLC (PJM). PJM is the Regional Transmission Organization for 13 states including parts of Kentucky, and is managing the interconnection of the Project in coordination with East Kentucky Power Cooperative (EKPC), which owns the transmission infrastructure to which the project is proposing to interconnect. The interconnection study process in PJM involves three study phases: Feasibility Study, System Impact Study, and Facilities Study.

Flat Run Solar, LLC made an interconnection application to PJM in August 2019 to interconnect the project on the Green County – Saloma 161kV transmission line. Following the application, a kickoff call with PJM and EKPC was held to begin the three-step study process.

The Feasibility Study was completed in January of 2020, and the Feasibility Study Report can be found in Attachment L.

The System Impact Study determines potential impacts to the regional electric grid and the need for any network upgrades to mitigate potential impacts. The System Impact Study Report for the Project was issued in August 2020 and can be found in Attachment M.

The third and final step, the Facilities Study, is currently underway and expected to be issued in mid-2021.

During the System Impact Study, the Project was flagged for the potential to impact the adjoining LG&E/KU transmission system. The Project signed an affected system study agreement with LG&E/KU, which has completed an affected systems study, and has determined that the Project does not require any upgrades or further studies to LG&E/KU facilities. PJM has confirmed that there are no other utilities that have the potential to be affected by the Project or that require affected systems studies.

A key purpose of PJM, EKPC and LG&E/KU's study process is to estimate the costs of any required upgrades, both at the Project site as well as elsewhere within the PJM transmission system, including other utilities outside of PJM, which the Project would create or contribute to, and to allocate such costs to the Project. The Project will be required to pay for any identified costs in order to interconnect and deliver electricity into the PJM and EKPC transmission system. In addition, Applicant has paid PJM and LG&E/KU for the costs of the study process.

#### **10.** Effect on Local and Regional Economies

<u>REQUIREMENT</u>: per KRS 278.706(2)(j); An analysis of the proposed facility's economic impact on the affected region and the state;

<u>COMPLIANCE</u>: See Attachment N for a report on the projected impact of the Project on local and regional economies, written by Paul A. Coomes, Ph.D, an Emeritus Professor of Economics from the University of Louisville.

On page 1 of the report, it states:

"There are two primary impacts expected from the project. First, there will be a one-time spike in construction and linked jobs as the site is constructed over approximately one year. Second, there will be four decades of new tax (PILOT) payments to local jurisdictions in Taylor County due to the increased value of real estate and the new tangible property installed at the site. Using company estimates of construction jobs and payroll, I estimate that there will be a total of 199 new jobs in the County in year one, with new payroll of \$9.89 million. And, the PILOT agreement will result in \$1.32 million in payments to County jurisdictions over the next forty years."

In addition to the economic impacts described in Professor Coomes' report, the Project will sell electricity and green credits on the open market, likely entering into a long-term power purchase agreement (PPA) with a company that has made a commitment to source renewable energy. At the time of this application, Flat Run is under exclusive negotiations with a company with operations in Kentucky for a long-term PPA for the electricity and renewable energy credits that will be generated by the Project. The PPA negotiations with the off-taker are moving towards final approval and execution by both parties.

A number of Kentucky-based companies and large Kentucky employers have made commitments to source renewable energy to power their Kentucky operations. Projects such as Flat Run will allow these companies to meet their objectives locally, keeping the tax revenue and jobs created by the new renewable energy projects in-state.

### **11. Record of Environmental Violations**

<u>REQUIREMENT</u>: per KRS 278.706(2)(k); A detailed listing of all violations by it, or any person with an ownership interest, of federal or state environmental laws, rules, or administrative regulations, whether judicial or administrative, where violations have resulted in criminal convictions or civil or administrative fines exceeding five thousand dollars (\$5,000). The status of any pending action, whether judicial or administrative, shall also be submitted;

<u>COMPLIANCE</u>: Neither Flat Run Solar, LLC, nor any entity with ownership interest in the Project, has violated any state or federal environmental laws or regulations. There are no pending actions against Flat Run Solar, LLC, nor any entity with ownership interest in the Project.

## 12. Site Assessment Report

<u>REQUIREMENT</u>: per KRS 278.706(2)(I); A site assessment report as specified in KRS 278.708. The applicant may submit and the board may accept documentation of compliance with the National Environmental Policy Act (NEPA) rather than a site assessment report

<u>COMPLIANCE</u>: The Site Assessment report is being contemporaneously filed herewith; please see the separate document titled "Flat Run Solar: Site Assessment Report" and labeled as Attachment O. Attachment A Context Map



| Flat Run Solar<br>Context Map            |  |
|--|--|
|  | Flat Run Solar<br>Potential Project Footprint  |
|  | Residential Neighborhoods<br>within 2,000ft of the<br>Project<br>(as defined in KRS<br>278.700(6)) |
| $\bigcirc$                               | Residential Buildings<br>within 2,000ft of the<br>Project  |
| •  | Project Landowner<br>Residences  |
|  | East Kentucky Power<br>Cooperative<br>Transmission Line  |
| /  | Kentucky State Roadways  |
| 2 mile radius                            |  |
| Campbellsville, KY<br>Approx. 5 miles SE |  |

## Attachment B Vegetative Buffer Example Photos



Image 1: A Solar Farm in Western NC. Buffer shown in a single row of 3-4ft tall evergreen trees.

Image 2: Solar Farm in Rutherford County, outside of Forest City, NC. Buffer shown is a single row of 3-6ft evergreen trees. Image from Google Streetview.



Image 3: Solar Farm in Franklin County, outside of Louisburg, NC. Image shown without a vegetative buffer from approximately 150ft from solar panels.



Image 4: Solar Farm in Orange County, outside of Mebane, NC. Buffer shown is an alternating row of evergreen trees approximately 6-7ft tall. Image from Google Streetview.



Image 5: Solar Farm in Orange County, outside of Mebane, NC. Buffer shown is mature, 9-12ft evergreen trees in alternating rows. This image was taken in January 2021 from the same solar project as Image 4, however the trees have grown larger.





Image 6: Solar Farm in Johnson County, outside of Selma, NC. Buffer shown is mature, 10-12ft evergreen bushes. Image from Google Streetview.

## Attachment C Proof of Notice of Application

#### NOTICE OF APPLICATION

Flat Run Solar, LLC, is proposing to construct and operate a 55-megawatt AC solar energy project located in Taylor County, Kentucky at approximately 5347 Saloma Rd, Campbellsville, KY 42718. The proposed Flat Run Solar Project will consist of up to 450 acres of solar photovoltaic panels and associated racking, inverters, energy storage system, and a project substation transformer.

Flat Run Solar, LLC is required to file an application for construction and operation of the proposed facility. This application is subject to the approval of the Kentucky State Board on Electric Generation and Transmission Siting, which can be reached at P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615, or via phone at (502) 564-3940.

A person who wishes to become a party to a proceeding before the board may, by written motion filed no later than thirty (30) days after the application has been submitted, request leave to intervene.

A party may, upon written motion filed no later than thirty (30) days after an application has been filed, request the board to schedule an evidentiary hearing at the offices of the Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615.

A request for a local public hearing or local public information meeting shall be made by at least three (3) interested persons who reside in the county or municipal corporation in which the pipeline, plant, or transmission line is proposed to be located. The request shall be made in writing and shall be filed within thirty (30) days following the filing of a completed application.

Any questions related to the application or its process may be directed to the Kentucky State Siting Board, which can be reached at P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615, or via phone at (502) 564-3940.

Thursday, March 11, 2021

CENTRAL KENTUCKY NEWS-JOURNAL

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> party may, upon written motion filed no later than thirty (30) days after an application has been filed, request the board to schedule an evidentiary hearing at the offices of the Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615.

> A request for a local public hearing or local public information meeting shall be made by at least three (3) interested persons who reside in the county or municipal corporation in which the pipeline, plant, or transmission line is proposed to be located. The request shall be made in writing and shall be filed within thirty (30) days following the filing of a completed application.

> Any questions related to the application or its process may be directed to the Kentucky State Siting Board, which can be reached at P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615, or via phone at (502) 564-3940.

> > GIVEN that Larry Finn of Campbellsville, KY has qualified as Admin-

istrator of the estate of Murey G. Finn of Camp-bellsville, KY on this day Feb. 4, 2021. All credi-

Feb. 4, 2021. All credi-tors must file claims by Aug. 4, 2021. Fiduciary represented by Hon. Barry Bertram of Camp-bellsville, KY. Susie Skaggs, Taylor Co. Cir-cuit Court Clerk.

ciary represented by Hon. Wesley Bright of Campbellsville, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk.

NOTICE IS HEREBY GIVEN that William Allen Wade of McMin-ville, TN has qualified as Executor of the estate of Ruth Mae Wade of Campbellsville, KY on this day Feb. 5, 2021. All creditors must file claims by Aug. 5, 2021. Fidu-ciary represented by Hon. John D. Bertram of Campbellsville, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk.

NOTICE IS HEREBY GIVEN that John Rob-ert Eastridge of Camp-bellsville, KY and Merideth Jaskowski of

#### TAYLOR COUNTY DISTRICT COURT LEGAL NOTICES

сниск MCGINNIS, **Executor** of the estate of Mildred A. McGinnis has filed final settlement this Feb. 25, 2021. A hearing for confirmation and for confirmation and approval will be held on March 26, 2021. Any exceptions to such set-tlement must be filed before that time. Susie Skaggs, Taylor Co. Cir-cuit Court Clerk.

preferred but not re-

quired. A minimum of

five years in office ex

To apply please send

employment application, resume, and letter of

interest to:

Human Resources

Lindsey Wilson College

210 Lindsey Wilson St. Columbia, KY 42728,

fax 270-384-7373, or

e-mail: hr@lindsey.edu

For more information

visit http://www.lindsey.edu

LWC is an EOE

perience preferred.

THEODORE JAMES OWEN MILBY, Administrator of the estate of Kevin Alan Milby hasfiled final settlement this Feb. 10, 2021. A hearing for confirmation and 10, 2021. A hearing tor confirmation and approval will be held on March 31, 2021. Any exceptions to such set-tlement must be filed before that time. Susie Skaggs, Taylor Co. Cir-cuit Court Clerk.

NOTICE IS HEREBY GIVEN that Mary J. Morrison of Campbells-ville, KY has qualified as Guardian in regards to Jay Henry Morrison of Campbellsville KY on Jay Henry Morrison of Campbellsville, KY on this day Feb. 9, 2021. All creditors must file claims by Aug. 9, 2021. Guard-ian represented by Hon. Joseph Stewart of Leba-non, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk Clérk.

NOTICE IS HEREBY GIVEN that Mary J. Morrison of Campbells-ville, KY has qualified as Guardian in regards to Dylan Wayne Morrison of Campbellsville, KY on this day Feb. 9, 2021. All creditors must file claims by Aug. 9, 2021. Guardby Aug. 9, 2021. Guard-ian represented by Hon. Joseph Stewart of Leba-non, KY. Susie Skaggs, Taylor Co. Circuit Court Clark

NOTICE IS HEREBY GIVEN that Angela Moore of Greensburg, KY has qualified as

Guardian in regards to Aspin Rose Moore of Campbellsville, KY on this day Feb. 24, 2021. All creditors must file Claims by Aug. 24, 2021. Guardian represented by Hon. Theodore Lavit of Lebanon, KY. Susie Skaggs, Taylor Co. Cir-cuit Court Clerk.

NOTICE IS HEREBY GIVEN that Connie Cox Arnold of Campbells-ville, KY has qualified as ville, KY has qualified as Executrix of the estate of Naomi Jean Cox of Campbellsville, KY on this day Feb. 9, 2021. All creditors must file claims by Aug. 9, 2021. Fidu-ciary represented by Hon. Rodger Cox of Campbellsville, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk.

NOTICE IS HEREBY GIVEN that Betty Coomer and Irene Robertson of Campbells-ville, KY, have qualified as Co-Executrixes of the estate of Lory Bennett of estate of Lory Bennett of Campbellsville, KY on this day Feb. 22, 2021. All creditors must file claims by Aug. 22, 2021. Fiduciary represented by Hon. Angela M. Call of Campbellsville, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk.

NOTICE IS HEREBY GIVEN that Calvin Car-roll of Marseilles, IL has qualified as Administrator of the estate of David Alan Carroll of Elkhom, Alan Carroll of Elkhorn, KY on this day Feb. 25, 2021. All creditors must file claims by Aug. 25, 2021. Fiduciary rep-resented by Hon. Angela M. Call of Campbellsville, KY. Susie Skaggs, Tay-lor Co. Circuit Court Clerk. Clerk

NOTICE IS HEREBY GIVEN that Vickie S. McKinley of Campbells-ville, KY has qualified as

Spring Hill, TN have qualified as Co-Executors of the estate of Audrey Faye Eas-tridge of Campbellsville, KY on this day Feb. 5, 2021. All creditors must file claims by Aug. 5, 2021. Fiduciary rep-resented by Hon. John D. Bertram of Campbells-ville, KY. Susie Skaggs, Taylor Co. Circuit Court Executrix of the estate of Rachel Louise Riggs of Campbellsville, KY on this day Feb. 25, 2021. All creditors must file claims by Aug. 25, 2021. Fiduciary represented by Hon. John D. Bertram of Campbellsville, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk. NOTICE IS HEREBY

Clerk. NOTICE IS HEREBY GIVEN that John David Vaughn of, Campbells-ville, KY has qualified as ville, KY has qualified as Executor of the estate of Helen F. Vaughn of Campbellsville, KY on this day Feb. 25, 2021. All creditors must file claims by Aug. 25, 2021. Fiduciary represented by Hon. John C. Miller of Campbellsville KY NOTICE IS HEREBY GIVEN that Danielle Smith of Campbells-ville, KY has qualified as Administratrix of the estate of Duril Bell of Campbellsville, KY on this day Feb. 4, 2021. All creditors must file claims by Aug. 4, 2021. Fidu-ciary represented by Hon. Wesley Bright of Campbellsville. Susie Skaggs, Taylor Co. Circuit Court Clerk.

Taylor Co. Circuit Court

NOTICE IS HEREBY GIVEN that Judy Kief of Niagara Falls, NY has qualified as Administraqualified as Administra-trix of the estate of Angel Marie Perkins of Niagara Falls, NY on this day Feb. 25, 2021. All credi-tors must file claims by Aug. 25, 2021. Fiduciary represented by Hon. Todd Greenwell of Lou-isville, KY. Susie Skaggs, Taylor Co. Circuit Court Clerk.

NOTICE IS GIVEN that Joseph Gary Giles of Greensburg, KY has qualified as Executor of the estate of Tressie Clodean Giles of Camp-bellsville, KY on this day March 5, 2021. All credi-tors must file claims by Sept. 5, 2021. Fiduciary represented by Hon. Rodger Cox of Camp-bellsville, KY. Susie Skaggs, Taylor Co. Cir-cuit Court Clerk.



#### Affidavit of Insertion

Before me, a notary public, personally appeared John Overby, general manager/editor, who certifies that any and all advertising material for Carolina Solar Energy – Notice of Application re: Flat Run Solar LLC – appeared in the Central Kentucky News-Journal datelined Thursday, March 11, 2021.

Signature

State of Kentucky County of Taylor

Sworn to and subscribed before me on this day March 11, 2021.

Suzanne Houk, Notary Public

My commission expires January 14, 2025.

Commission Number KYNP21170



400 West Main, Suite 503 Durham, NC 27701 919-682-6822 www.carolinasolarenergy.com

Name Add1 Add2

#### CERTIFIED MAIL, RETURN RECIEPT REQUESTED With copy to Regular US Mail

#### **Re: Flat Run Solar Notice of Application**

Dear name,

This letter is to inform you that Flat Run Solar, LLC is proposing to construct and operate a solar photovoltaic facility adjacent to property you own in Taylor County. The Flat Run Solar Project is proposed to be located at approximately 5347 Saloma Rd, Campbellsville, KY 42718. The proposed facility and its applicants previously hosted a virtual public meeting about the project on September 17<sup>th</sup>, 2020, with a physical showing occurring at the Lake Cumberland Area Development District Kentucky Career Center-Campbellsville.

The solar technology used is photovoltaic, and the solar panels sit on racks that are up to 15 feet tall that rotate once per day on a North-South axis to track the sun throughout the day. The 55-megawatt facility will contain solar panels, inverters, a battery energy storage system, a project substation transformer, and an associated balance of wiring system. The Flat Run Solar Project will be sited on approximately 450 acres of land.

Flat Run Solar, LLC is required to file an application for construction and operation of the proposed facility. This application is subject to the approval of the Kentucky State Board on Electric Generation and Transmission Siting, which can be reached at P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615, or via phone at (502) 564-3940.

A person who wishes to become a party to a proceeding before the board may, by written motion filed no later than thirty (30) days after the application has been submitted, request leave to intervene.

A party may, upon written motion filed no later than thirty (30) days after an application has been filed, request the board to schedule an evidentiary hearing at the offices of the Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615.



400 West Main, Suite 503 Durham, NC 27701 919-682-6822 www.carolinasolarenergy.com

A request for a local public hearing or local public information meeting shall be made by at least three (3) interested persons who reside in the county or municipal corporation in which the plant is proposed to be located. The request shall be made in writing and shall be filed within thirty (30) days following the filing of a completed application.

Any questions related to the application or its process may be directed to the Kentucky State Siting Board, referenced above.

Sincerely,

Cura.

Carson Harkrader CEO



400 West Main, Suite 503 Durham, NC 27701 919-682-6822 www.carolinasolarenergy.com

Name Add1 Add2 CERTIFIED MAIL, RETURN RECIEPT REQUESTED With copy to Regular US Mail

#### **Re: Flat Run Solar Notice of Application**

Dear name,

This letter is to inform you that Flat Run Solar, LLC is proposing to construct and operate a solar photovoltaic facility adjacent to property you own in Taylor County. The Flat Run Solar Project is proposed to be located at approximately 5347 Saloma Rd, Campbellsville, KY 42718. The proposed facility and its applicants previously hosted a virtual public meeting about the project on September 17<sup>th</sup>, 2020, with a physical showing occurring at the Lake Cumberland Area Development District Kentucky Career Center-Campbellsville.

The solar technology used is photovoltaic, and the solar panels sit on racks that are up to 15 feet tall that rotate once per day on a North-South axis to track the sun throughout the day. The 55-megawatt facility will contain solar panels, inverters, a battery energy storage system, a project substation transformer, and an associated balance of wiring system. The Flat Run Solar Project will be sited on approximately 450 acres of land.

Flat Run Solar, LLC is required to file an application for construction and operation of the proposed facility. This application is subject to the approval of the Kentucky State Board on Electric Generation and Transmission Siting, which can be reached at P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615, or via phone at (502) 564-3940.

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400 West Main, Suite 503 Durham, NC 27701 919-682-6822 www.carolinasolarenergy.com

A request for a local public hearing or local public information meeting shall be made by at least three (3) interested persons who reside in the county or municipal corporation in which the plant is proposed to be located. The request shall be made in writing and shall be filed within thirty (30) days following the filing of a completed application.

Any questions related to the application or its process may be directed to the Kentucky State Siting Board, referenced above.

Sincerely,

Cura.

Carson Harkrader CEO


















| 67   | U.S. Postal Service <sup>™</sup><br>CERTIFIED MAIL <sup>®</sup> RECEIPT<br>Domestic Mail Only  |                   |  |
|------|--|-------------------|--|
| L J  | For delivery information, visit our website  | at www.usps.com®. |  |
| =0   | Campbellsville, KY 42718   | USE               |  |
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| гu   | 10tal Postage and Fees<br>\$7.00   | 03/12/2021        |  |
| PLO5 | sent 7<br>Sent 7<br>Tennessee Gas Pipeline Company LLC<br>Street<br>1380 Hobson Rd   |                   |  |
|      | PS Fo Campbellsville Ky 42718  | tructions         |  |













# Attachment D

# Letter from Taylor County Judge Executive Barry Smith

Barry Smith County Judge/Executive tcjudgeexec@taylorcounty.us

Magistrates:

James Jones - 1st Dist. John D. Gaines - 2nd Dist. Tommy Corbin - 3rd Dist.



Melissa W. Williams County Treasurer treasurer@taylorcounty.us

Magistrates:

Zuel Yarberry - 4th Dist. Derrick Bright - 5th Dist. Richard A. Phillips - 6th Dist.

#### OFFICE OF THE JUDGE/EXECUTIVE 203 N. Court St., Suite 4 Campbellsville, Kentucky 42718 270-465-7729 • Fax: 270-789-3675

www.taylorcounty.us

March 23, 2021

Horseshoe Bend Solar, LLC c/o Carolina Solar Energy 400 W. Main Street, Suite 503 Durham, NC 27701

**RE: Taylor County Solar Project** 

Dear Mr. Harkrader:

This is to confirm that Taylor County has no planning and zoning ordinance or jurisdiction. We have no noise ordinance applicable to the proposed Horseshoe Bend Solar project to be located here in Taylor County.

Sincerely,

Barry Smith Taylor County Judge Executive



Equal Opportunity Employer M\E\D

Attachment E Certificate of Compliance

#### KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION

#### FLAT RUN SOLAR, LLC CASE NO. 2020-00272

#### STATEMENT REGARDING CERTIFICATION REQUIRED BY KRS 728.706(2)(d)

Comes the undersigned and states as follows:

1. That my name is Carson Harkrader and I am the CEO of Carolina Solar Energy III,

LLC, the Manager of Flat Run Solar, LLC, the Applicant herein;

2. That I am over 18 years of age and I am a resident of the State of North Carolina;

3. That I have conducted an inquiry into the facts contained in this Statement and believe them to be true to the best of my knowledge;

4. That the proposed facility as planned will be in compliance with any and all local ordinances and regulations concerning noise control, and will also be in compliance with any and all applicable local planning and zoning ordinances as provided in KRS 278.704(3);

5. There are no setback requirements established by the planning and zoning commission for land located in Taylor County, including Flat Run Solar's project area.

Signed this 30th day of March 2021.

CARSON HARKRADER

# Attachment F Public Involvement Activities

## Flat Run Solar Project (Taylor County, KY) Public Involvement Activities (KRS 278.706(2)(f))

Flat Run Solar, LLC, through its parent Carolina Solar Energy III, LLC (collectively, **"Carolina Solar"**), has made a substantial effort to engage the public in numerous ways regarding its solar project in Taylor County (the **"Flat Run Project"**). The following is a brief summary of the public involvement activities undertaken prior to the submission of this Application. Carolina Solar will continue these efforts and will participate in any public notice, comment and hearings which may be initiated as part of ongoing permitting activities.

- On numerous occasions from September, 2019, through the date of this Application, Solomon Van Meter, Community Representative for Carolina Solar, has spoken with and met in Campbellsville, KY, with **Barry Smith, Taylor County Judge Executive**, regarding various aspects of the Flat Run Project.
- On October 28, 2019, Solomon Van Meter, Community Representative for Carolina Solar, met with the Director and faculty members of the Conn Center for Renewable Energy Research at the J.B. Speed School of Engineering, University of Louisville, to discuss various solar projects, including the Flat Run Project.
- On October 29, 2019, Carolina Solar co-hosted a day-long Utility Scale Solar Workshop for Public Officials at the Marion County Public Library, Lebanon, KY (announcement/agenda attached). The workshop was attended by approximately thirty (30) public officials from various Kentucky counties in which solar power generation projects have been proposed, including Ron McMahan, Executive Director of the Taylor County Economic Development Authority. Barry Smith, Taylor County Judge-Executive, was not able to attend the meeting but was invited. The workshop featured presentations on topics including environmental health & safety, property values, land leasing, and economic benefits to hosting counties, as well as informal meetings between representatives of Carolina Solar and attendees.
- On February 12 & 13, 2020, representatives of Carolina Solar, including Carson Harkrader, CEO, met in Frankfort, KY, with various members of the Kentucky Legislature, including Sen. Max Wise (Senate District 16), whose district includes the Flat Run Project, and discussed the project.
- On February 24, 2020, Solomon Van Meter, Community Representative for Carolina Solar, met in Greensburg, KY, with Jordan Turner, Principal of the Green County Area Technical Center to discuss workforce development and the Flat Run Project, as well as other projects. (The Green County Area Technical Center serves Taylor County High School and Campbellsville High School.)

- In May 2020, at the outset of the COVID-19 pandemic, Carolina Solar contacted Kathy England, Director of the Taylor County Senior Center and made a contribution to assist with the food pantry operated by the center.
- On June 6, 2020, Solomon Van Meter, Community Representative for Carolina Solar, met with **Ricky Dale Shreve, a landowner adjacent to the project,** to discuss the Flat Run Project.
- On July 10, 2020, Solomon Van Meter, Community Representative for Carolina Solar, met in Campbellsville, KY, with several officers in the Campbellsville Police Department and the Kentucky State Police, including Scott Curry, Matt Weddle, Charlie Houk and Ryan Jewell to discuss the Flat Run Project, as well as other projects.
- On July 30, 2020, Solomon Van Meter, Community Representative for Carolina Solar, met with Darryl McGaha, Executive Director of the Lake Cumberland Area Development District, to discuss the Flat Run Project.
- On September 2, 2020, Solomon Van Meter, Community Representative for Carolina Solar, spoke with Magistrate James Jones and Magistrate Richard Phillips of the Taylor County Fiscal Court whose magisterial districts each include a portion of the Flat Run Project, about the project.
- On September 9, 2020, representatives of Carolina Solar, including Carson Harkrader, CEO, met virtually with members of the Kentucky Agriculture Commissioner's staff (Tim Hughes, Gus Hebert and Keith Rogers), regarding the Flat Run Project and other projects.
- For the three business days prior to the September 17, 2020 public meeting, a large (24 x 36 inch) printed map of the site layout was displayed in the entrance to the Taylor County Courthouse in Campbellsville, along with information about the upcoming public meeting.
- On September 17, 2020, Carolina Solar hosted an open public meeting about the Flat Run Project. The meeting was advertised in the Greensburg Record Herald on September 3, 2020. The meeting took place on Zoom.com and was also projected onto a screen for in-person attendees at the Campbellsville office of the Lake Cumberland Area Development District. The meeting featured formal presentations by Carson Harkrader, CEO of Carolina Solar, Chris Jones, Manager of Project Development of Carolina Solar, a consulting electrical engineer, and a real estate valuation expert. Attendees were shown and invited to inspect enlarged satellite images showing the exact location of the proposed solar array. The meeting afforded attendees the opportunity to ask questions of the presenters. The video presentation shown at the public meeting can be viewed on the Carolina Solar website, at www.carolinasolarenergy.com/projects-indevelopment-source/flat-run

Attachment G Local Newspaper Article

# Energy company hosts virtual town hall

## 'Flat Run' solar farm on track for construction in 2023

JOHN L. MOORE reporter@cknj.com

Carolina Solar Energy held a virtual meeting last week to answer questions from the public about its plan for a solar farm in Taylor County.

The company, based in Durham, North Carolina, has been negotiating with landowners in the county to secure the rights to roughly 450 acres of land five miles northwest of the city of Campbellsville, with the top-left corner of the development starting at the intersection of Saloma Road and Hobson Road and the top-right corner ending at a property line several hundred feet away from Old Lebanon Road.

The company is calling the Taylor County development "Flat Run" because the majority of the land it intends to place the panels on is flat, which is ideal for solar energy production. "We've been working

on this project for a little over a year, and typically, around this stage of development, we would have a neighborhood dinner, where we would invite all of the neighbors and landowners adjacent to the project out to a local restaurant to get to knows us, look over the site plans and ask questions," said Carson Harkrader, CEO of Carolina Solar Energy, during a pre-recorded presentation video played for attendees at the meeting's start. "But we aren't able to come to Kentucky right now, so we're making this video instead."

#### Why Taylor County?

"The reason we are developing this project in Taylor County is that the East Kentucky Power Cooperative, which runs the transmission lines in this area, is part of what's known as the 'PJM Interregion,' connection which includes several other states like Virginia, Indiana and North



tion, which owns Kentucky Utilities.

"Within the PJM Interconnection region, companies can buy and sell energy directly via private contract. There are many large businesses in this region, several on the Fortune 500, who have corporate mandates to procure renewable electricity to meet their company's electricity needs, and so those companies want to sign contracts directly with solar farms like this one to meet those corporate mandates."

PPL is among the many power companies seeking to reduce the greenhouse gas emissions that contribute to global climate change, with a corporate mandate to reduce its emissions by 80% by the year 2050.

While researchers and scientists are developing techniques for capturing emissions from fossil fuels like coal and natural gas in order to continue using them for power generation, renewable resources like sunlight are a safer, more reliable bet to reduce emissions in the short-term, meaning energy from solar farms is in high demand.

To be able to use energy from a solar farm, it has to be located in the region where the energy is going to be used, and it must be located near transmission lines that can carry the power. As such, Carolina Solar Energy has been in search of possible solar farm sites throughout the region, expanding its scope beyond North Carolina, where it currently has more than 40 solar farms in operation with two more planned.

The Flat Run project in Taylor County is just one of several solar farms the company intends to place in Kentucky.

The "Horseshoe Bend" project in Green County and the "Mount Olive Creek" project in Russell County are set to be completed in 2023, which is when Taylor County's solar farm is set to be completed, while "Glover Creek" and "Turkey Creek" are set to be completed in Summer Shade and Lancaster respectively in 2022.

#### How will it work?

The stretch of land will have a 15-foot security fence surrounding the property, and within will sit rows of large solar panels which take in natural sunlight and convert it to electricity.

The panels are separated into clusters to allow maintenance workers to move through them, and are fastened onto racks that pivot to point towards the sun as it moves across the sky throughout the day in order to increase the amount of power they put out.

Once the solar panels have converted the light into electricity, it is delivered through wires to a piece of equipment called an inverter, which ensures the electricity being sent over local transmission lines is the proper voltage and converts it from direct current (DC) power to alternating current (AC) power, which is then used to power homes and businesses. Several smaller inverter boxes will be installed near clusters of solar panels throughout the

acreage, and a substation will be located off of West Saloma Road so that utility workers can access it for maintenance purposes.

The panels are expected to generate 55 megawatts of energy per day, enough to power approximately 13,750 homes.

Carolina Solary Energy plans to maintain the solar farm until the panels reach their maximum lifespan of 40 years, at which point they intends to pack all of their equipment up, recycle as much of the spent solar panel materials as they can and then return the land to its prior use.

Chris Sandifer, a career electrical engineer from Duke Energy who now works with Carolina Solar Energy, stated during the video presentation that much of the material used in the solar panels could be recycled and the metal mounting racks would not harm the environment upon which they rest.

#### **Community impact**

Aside from the benefits that come naturally from reducing carbon emissions, the main benefit of having a solar farm in Taylor County over the course of the next 40 years is property tax revenue.

Carolina Solar Energy will pay taxes on the property its solar panels sit on for as many years as the solar farm is still there, which directly benefits the county, especially the Taylor County School District and the Taylor County Sheriff's Office.

20 years of a solar farm's operation, it contributes a total of nearly \$1 million in property taxes to the county in which it is located.

In addition, the eight to 12 months of construction work has the potential to provide a hundred or so jobs to construction workers and sub-contractors, which they hope to be able to hire locally, and once the project is finished the company expects a handful of opportunities to be created for maintenance workers and landscapers.

"Obviously, it's better if workers are located in the community," said Harkrader. "Training is provided."

She also pointed out that any workers who come in from surrounding counties would be spending their money shopping, dining, renting hotel rooms and getting gas in Taylor County, which could prove to benefit local businesses.

Carolina Solar Energy also addressed some of the potential concerns that they've heard voiced from communities in the past. They company will be planting trees in key locations around the perimeter of the project area so that home owners should have less of an 'eyesore,' if that's something they're worried about, and they claim the noise is quiet enough and the nearby homes are far away enough that the sound should blend in with the usual background noise if it isn't too quiet too hear.

quartered in Raleigh, North Carolina, to review the impact of the solar farm on nearby property values. Kirkland is a certified general appraiser in the state of Kentucky who has studied the impact of solar farms on property values for several years, and he has found that there is no noticeable impact on home values when a solar farm is built adjacent to them.

He goes on to suggest that rather than having a negative impact on nearby residential properties, some homeowners actually prefer having a solar farm as their neighbor compared to other houses or a farm, which can generate noise from frequent traffic or loud occupants, create light pollution, kick up dust and, in some cases, result in odors, all of which are factors which could make a property less interesting to potential buyers.

Ultimately, Harkrader said her company's goal is to be a good neighbor, which is why they have spent the last year working with local stakeholders to get the project to a point where they felt confident discussing it publicly.

She encouraged anyone with questions or concerns to reach out to the company by leaving a message at 919-682-6822 — they're working from home due to COVID-19, but check their voicemail daily or emailing info@carolinasolarenergy.com. A page on the company's website dedicated to the Flat Run project can be found online at bit. ly/3mJOet2.

Carolina Harkrader explained.

EKPC is headquar-tered in Winchester, while PJM Interconnection, LLC, has its headquarters in Valley Forge, Pennsylvania, and has been in operation since 1927. It currently has more than a thousand member companies, including PPL Corpora-

Harkrader stated that, typically, within the first The company also hired Richard C. Kirkland Jr., of Kirkland Appraisals, LLC, head-

# Durrett resigns as city engineer

## Former city employee recently appointed as LaRue County Judge-Executive by Gov. Beshear

#### JOHN L. MOORE reporter@cknj.com

Blake Durrett, formerly Campbellsville's city engineer, was named judge-executive of

LaRue County last week. Josh Pedigo, director of public works, told the CKNJ in an interview that Durrett had actually left the city in a pretty good position — so much so that there are no immediate plans to fill his position.

"We had all of that stormwater stuff going on ... but that kind of dropped off when the city council passed that new ordinance a couple months ago, the one that made it so any project less than an acre doesn't have to have a permit to do the construction,' Pedigo said.

That change decreased the city's workload dramatically, to the point there are only three or four construction projects left that need to work with the city to ensure their compliance with stormwater regulations.

"What we're looking for

is probably just a stormwater person. I don't know if we'll hire a city engineer, per se, maybe just someone part-time, or contracting it out as needed."

Campbellsville Municipal Water and Sewer already works with Monarch Engineering on relatively frequent projects like water line and sewer line extensions, which Pedigo says costs the city "pretty much nothing" because Monarch considers them "everyday things" given how little work goes into their planning.

Besides his work for the water company, Pedigo said Durrett had already completed all of the work he needed to do for planning the sports complex.

"That's pretty much a done deal; those guys out there know what they're supposed to finish and there's a deadline for them to finish by, so he would pretty much just go out there and make sure they were working."

Aside from designing and managing construction projects, Pedigo said Durrett's biggest job was handling paperwork.

The sidewalk project currently underway on Lebanon Avenue was another thing Durrett had a hand in planning, but he left before he could file the paperwork necessary to prove the grant money the city used for the project was being used in a way that matches the terms of the grant.

Pedigo said that was hardly an issue, as he'd already been meaning to take over much of the routine paperwork that Durrett had to file to lessen his workload a little bit.

While the city may have a good handle on all of its projects so soon after his departure, Pedigo made it clear that was in large part thanks to all of the heavy lifting Durrett had already done.

One big example that stuck out to Pedigo was when the water company started installing flow monitors to keep track of water pressure in Miller Park.

Durrett was assisting them with finding trends in the data, and there was a ton to go through.

"You have 30 days' worth of numbers collected over the course of 24 hours in a day, and it's

a lot to decipher, but then we went with Wauford Engineering and they got sent all of the data that he'd helped with at that point," Pedigo said.

2984 Old Columbia Rd.

(about a mile past Cox Interior)

the city, and he helped out a lot. I'm not an engineer, so I don't know some of the stuff he knew, but he would answer any of the ques-

"He was a big asset to tions I or anyone else would bring him. It was a surprise to find out he was leaving, but I'm happy for him, I hope it works out for him and he's definitely missed."



# Attachment H

# **Public Meeting Notice Documentation**



400 West Main, Suite 503 Durham, NC 27701 919-682-6822 www.carolinasolarenergy.com

Name Address 1 Addess 2

September 1, 2020

#### Re: Flat Run Solar Project – Invitation to Public Meeting

Dear \_\_\_\_,

I'm writing to invite you to a public meeting that our company is hosting for a solar project we are developing on parcels adjacent to a parcel you own in Taylor County. We are hosting the public meeting to meet the neighbors of the project and members of the public, share information about the solar project, and provide you with an opportunity to ask us questions and share comments. The proposed solar project is located to the East and North of the intersection of Saloma Rd and Hobson Rd, approximately 5 miles Northwest of Campbellsville.

The meeting will be held at <u>5:30pm Central (6:30pm EDT) on Thursday, September 17, 2020</u>. In order to help us adhere to CDC guidelines on social distancing, attendees are strongly encouraged to attend the meeting remotely via video link, by registering at the link shown on the next page. You will need an email address in order to register and login to the meeting, and you will be able to ask questions verbally or in writing live at the end of the meeting. The meeting will also be broadcast at the meeting room in the Lake Cumberland Area Development District Kentucky Career Center-Campbellsville, 1311-C East Broadway, Campbellsville, KY 42718. A limited number of spaces are available to attend the broadcast in-person, which will be subject to CDC guidelines on the wearing of masks and social distancing. If you would like to attend in person, please sign up by contacting Tyler Caron at the contact information on the next page. All of our presenters will participate remotely.

During the public meeting we will show a video with information on the project, our company, solar energy technology, real estate property values, and health and safety. You can also watch the video any time after September 13<sup>th</sup> by accessing it from our website at <u>https://www.carolinasolarenergy.com/projects-in-development-source/flat-run</u>.<sup>1</sup> There you will see a link to watch the video, as well as the layout map and additional information about the project.

<sup>&</sup>lt;sup>1</sup> (You can also access the page by visiting <u>www.carolinasolarenergy.com</u>, clicking on our

<sup>&</sup>quot;Projects" page, scrolling down to the bottom, and clicking on the Flat Run project.)



If you would like to see a map of the solar project in person before the public meeting, a large printed map of the proposed layout will also be posted at the entrance to the Taylor County Courthouse at 203 N Court St, Campbellsville, KY 42718 for the 3 business days prior to the public meeting (September 13-16, 2020).

If you would like to speak with us about the project, please call Project Developer Tyler Caron at (984) 260-8038 or email us at info@carolinasolarenergy.com.

We look forward to seeing you virtually at the public meeting!

Sincerely,

Cura

Carson Harkrader CEO

To attend the September 17<sup>th</sup> online Zoom public meeting, please register at:

http://solar-projects.net/taylorcountysolar

<u>To attend the September 17<sup>th</sup> in-person broadcast of the public meeting</u> <u>at the Lake Cumberland Area Development District Kentucky Career Center-</u> <u>Campbellsville (limited spaces available):</u>

Please call Tyler Caron at (984) 260-8038 or email info@carolinasolarenergy.com.



919-682-6822 www.carolinasolarenergy.com

#### Flat Run Solar Fact Sheet

Flat Run Solar is a new proposed solar energy facility planned to the to the East and North of the intersection of Saloma Rd and Hobson Rd, approximately 5 miles Northwest of Campbellsville. This 55MW facility will generate enough electricity to power approximately 15,000 homes.

The solar technology used is photovoltaic, and the solar panels sit on racks that are up to 15 feet tall that rotate once per day on a North-South axis to track the sun throughout the day. The project will not generate any emissions, and there is no noise audible outside of the project boundary. A battery storage system will be connected to the facility to store electricity generated during the day for delivery to the grid at other times. The solar farm will be set back from property lines and a vegetative buffer will be planted in areas to help screen the facility from sight. The footprint of the facility is approximately 450 acres. Grass will be maintained under the panels with minimal amounts of concrete or gravel used throughout the facility. The facility will be surrounded by a locked security fence.

The solar farm will pay significant county taxes over the course of the project lifetime, with little to no expenditure from the county. The project will generate hundreds of construction jobs for approximately 1 year, as well as a handful of long-term maintenance and landscaping positions. The solar farm will not impact local electricity rates.

Flat Run Solar will include a strip of native pollinator plantings and pollinator trees in sections of the vegetative buffer.

Real estate appraisers have completed many matched-pair analyses on residential homes adjacent to solar farms. These matched-pair analyses compare the value of homes before and after the construction of a solar farm, and show that the construction of a solar farm has no discernable impact on the sales price of surrounding homes. A report from a Kentucky licensed professional appraiser detailing this analysis for Flat Run Solar is available on our website and on request.

#### PUBLIC NOTICE

Flat Run Solar, LLC, is proposing to construct and operate a solar energy project in Taylor County, Kentucky. The proposed Flat Run Solar Project will be located on approximately 450 acres to the East and North of the intersection of Saloma Rd and Hobson Rd, approximately 5 miles Northwest of Campbellsville. A public meeting to inform the community about the project will take place on Thursday, September 17th, 2020 at 5:30PM Central (6:30PM EDT).

In order to comply with current guidelines for social distancing, the public meeting and information about the project will be accessible as follows:

- (1) All representatives and experts from Flat Run Solar, LLC making presentations at the public meeting will do so via a Zoom online meeting.
- (2) Members of the public will be able to view the public meeting live, on-line on Zoom, without cost, by registering with a valid email address at <u>http://solar-projects.net/taylorcountysolar</u>. Participants will be able to ask questions either orally or in writing at the end of the presentation.
- (3) Members of the public are strongly encouraged to participate via the online meeting. The public meeting will also be projected for viewing at the Lake Cumberland Area Development District Kentucky Career Center-Campbellsville, 1311-C East Broadway, Campbellsville, KY 42718 at which a representative of Flat Run Solar, LLC will be present and a mechanism will be provided for any in-person attendees to ask questions. In-person attendance at the public meeting will be consistent with guidelines and directives from the CDC and the Office of the Governor in effect at the time of the meeting, including, but not limited to, social distancing and the requirement that masks be properly worn at all times. In order to allow for social distancing, the number of attendees at the in-person meeting will be limited and spaces allocated to the public on a first-come, first-served basis. To sign up for a space at the in-person meeting please email info@carolinasolarenergy.com or call (984) 260-8038.
- (4) A large-scale layout map of the proposed project will be available to the public for review in the entrance to the Taylor County Courthouse at 203 N Court St, Campbellsville, KY 42718 for the three business days prior to the public meeting.
- (5) Information about the proposed project, including the layout map, is also available online at https://www.carolinasolarenergy.com/projects-in-development-source/flat-run

The proposed photovoltaic solar project will consist of solar panels installed on racks with an approximate maximum height of 15 feet, inverters, transformers, an energy storage system, associated wiring and balance of system, and a substation. The power generated by the project will be linked to the electric transmission grid via the existing transmission easement that crosses the property. The project will install a visual vegetative buffer along portions of the perimeter of the project that will be comprised of two staggered rows of native, evergreen plantings.

Anyone with questions about the September 17th public meeting for the Flat Run Solar Project may request information by emailing info@carolinasolarenergy.com or calling (984) 260-8038.

#### A19

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Legals

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This advertisement was paid for by Taylor County Fiscal Court using taxpayer dollars in the amount of \$33.36.

#### 300 Legals

#### NOTICE OF PUBLIC HEARING

The Public Service Commission of Kentucky issued an order on August 26, 2020, scheduling a hearing to be held on September 10, 2020, at 9:00 a.m., Eastern Davlight Time, in the Richard Raff Hearing Room of the Commission's offices located at 211 Sower Boulevard in Frankfort, Kentucky, for the purpose of cross-examining witnesses in Case No. 2020-00060, which is Electronic Application of Kentucky Jtilities Company for Approval of its 2020 Compliance Plan for Recovery by Environmental Surcharge. This hearing will be streamed live and may be viewed on the PSC website, psc.ky.gov. Pubic comments may be made at the beginning of the hearing. Those wishing to make oral public comments may do so by ollowing the instructions listed on the PSC website, psc.ky.gov. Kentucky Utilities

Company 220 West Main Street Louisville, Kentucky 40202

#### PUBLIC NOTICE

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(4) A large-scale layout map of the proposed project will be available to the public for review in the entrance to the Taylor County Courthouse at 203 N Court St, Campbellsville, KY 42718 for the three business days prior to the public meeting.
(5) Information about the proposed business of the proposed business days prior to the public meeting.

(5) Information about the proposed project, including the layout map, is also available online at https://www.carolinasolarenergy.com/projects-in-development-source/flat-run

development-source/flat-run The proposed photovoltaic solar project will consist of solar panels installed on racks with an approximate maximum height of 15 feet, inverters, transformers, an energy storage system, associated wiring and balance of system, and a substation. The power generated by the project will be linked to the electric transmission grid via the existing transmission easement that crosses the property. The project will install a visual vegetative buffer along portions of the perimeter of the project that will be comprised of two staggered rows of native, evergreen plantings. Anyone with questions about the September 17th public meeting for the Flat Run Solar Project may request information by emailing info@

the Flat Run Solar Project may request information by emailing info@ carolinasolarenergy.com or calling (984) 260-8038.

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Attachment I Map Showing New Parcel



New Parcel

744



-er Bours

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# Attachment J

# Layout Map Presented at Public Meeting

adjusted within the Potential Project Footprint Area



Attachment K Letter from Tennessee Gas



March 3, 2021

Carson Harkrader Flat Run Solar, LLC c/o Carolina Solar Energy 400 West Main Street, Suite 503 Durham, NC 27701

Via Email: charkrader@carolinasolarenergy.com

Re: Flat Run Solar

Dear Ms. Harkrader:

Thank you for your letter dated February 18, 2021, regarding the Flat Run Solar Project. We received prior notice of the public meeting held on September 17, 2020.

We do not object to your inclusion of the additional parcel identified in the letter and attached map. It has been explained to Tennessee Gas Pipeline that our access road nor pipeline right of way will be fenced off by the Flat Run Solar Project.

Thanks again for keeping us informed about the scope of your project.

Dry Wight 3/3/21 Greg Wright - Operations Supervisor



400 West Main Street, Suite 503 Durham, NC 27701 office (919) 682-6822 www.carolinasolarenergy.com

February 18, 2021

Tennessee Gas Dee Mann

Dear Dee,

#### Re: Flat Run Solar

Thanks very much for your earlier help with our Turkey Creek project near Lancaster in Garrard County, KY which had a Tennessee Gas transmission line on the property. Your quick response on that project was very helpful!

I'm writing in regards to a different utility scale photovoltaic solar energy facility we call "Flat Run" that my company is planning on parcels to the East and South of the Tennessee Gas facility on West Saloma Road/Hobson Road (HWY 744) in Taylor County, Kentucky. A layout map of the Flat Run project showing the neighboring Tennessee Gas facility is attached to this letter.

We are preparing to apply to the Kentucky Siting Board for a permit that is required to operate Flat Run. Prior to submitting the permit application, we are required to hold a public meeting to provide neighbors of the facility, and the general community, with information about the solar project. We held that public meeting on September 17, 2020. An invitation to the public meeting was mailed to Tennessee Gas Pipeline Company, L.L.C., P.O. Box 2511, Houston, TX 77252-2511.

After the public meeting, a new landowner agreed to lease their land to the solar project. Because this parcel was added to the project after the public meeting, their property was not included in the layout map that we shared at the public meeting. The new landowner's property is located immediately to the East of the Tennessee Gas facility, and is outlined in red on the section of layout map shown on the next page.

I'm writing to seek Tennessee Gas's support for our addition of this new landowner into the solar project area, without holding a new public meeting. In accordance with Kentucky statute, we must wait 90 days after a public meeting to submit our application to the Siting Board, and we are ready to submit our application at the end of this month. A 90-day delay would pose a challenge to the project timeline, and so your help would be very greatly appreciated.

A letter stating that you do not oppose Flat Run Solar, LLC's anticipated application to the Kentucky Siting Board for a solar energy facility, that we have sent you information on this new parcel of land that we propose to include in the project, and that the notice we sent for the public meeting held September 17, 2020 is acceptable notice to Tennessee Gas of the project including the new parcel, will provide us with everything we think we will need. Draft suggested language for your letter is attached.

Again, I would be extremely grateful for your help in this matter. Thank you in advance!

Sincerely,

Carson Harkrader CEO



The parcel outlined in red is the new parcel which was not included in the layout map shown at our public meeting on September 17, 2020. The rest of the solar project, aside from the parcel outlined in red, is the same as what was presented in September.

# Attachment L PJM Interconnection Feasibility Study Report



# Generation Interconnection Feasibility Study Report for Queue Project AF1-083 GREEN COUNTY-SALOMA 161 KV 33 MW Capacity / 55 MW Energy

January, 2020

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## 1 Preface

The intent of the feasibility study is to determine a plan, with ballpark cost and construction time estimates, to connect the subject generation to the PJM network at a location specified by the Interconnection Customer. The Interconnection Customer may request the interconnection of generation as a capacity resource or as an energy-only resource. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: (1) Direct Connections, which are new facilities and/or facilities upgrades needed to connect the generator to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system.

In some instances a generator interconnection may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection, may also contribute to the need for the same network reinforcement. Cost allocation rules for network upgrades can be found in PJM Manual 14A, Attachment B. The possibility of sharing the reinforcement costs with other projects may be identified in the feasibility study, but the actual allocation will be deferred until the impact study is performed.

The Interconnection Customer seeking to interconnect a wind or solar generation facility shall maintain meteorological data facilities as well as provide that meteorological data which is required per Schedule H to the Interconnection Service Agreement and Section 8 of Manual 14D.

PJM utilizes manufacturer models to ensure the performance of turbines is properly captured during the simulations performed for stability verification and, where applicable, for compliance with low voltage ride through requirements. Turbine manufacturers provide such models to their customers. The list of manufacturer models PJM has already validated is contained in Attachment B of Manual 14G. Manufacturer models may be updated from time to time, for various reasons such as to reflect changes to the control systems or to more accurately represent the capabilities turbines and controls which are currently available in the field. Additionally, as new turbine models are developed, turbine manufacturers provide such new models which must be used in the conduct of these studies. PJM needs adequate time to evaluate the new models in order to reduce delays to the System Impact Study process timeline for the Interconnection Customer as well as other Interconnection Customers in the study group. Therefore, PJM will require that any Interconnection Customer with a new manufacturer model must supply that model to PJM, along with a \$10,000 fully refundable deposit, no later than three (3) months prior to the starting date of the System Impact Study (See Section 4.3 for starting dates) for the Interconnection Request which shall specify the use of the new model. The Interconnection Customer will be required to submit a completed dynamic model study request form (Attachment B-1 of Manual 14G) in order to document the request for the study.

The Feasibility Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

## 2 General

The Interconnection Customer (IC), has proposed a Solar generating facility located in Taylor County, KY. The installed facilities will have a total capability of 55 MW with 33 MW of this output being recognized by PJM as Capacity. The proposed in-service date for this project is 12/31/2022. This study does not imply a TO commitment to this in-service date.

| Queue Number        | AF1-083                    |
|---------------------|----------------------------|
| Project Name        | GREEN COUNTY-SALOMA 161 KV |
| State               | КҮ                         |
| County              | Taylor                     |
| Transmission Owner  | ЕКРС                       |
| MFO                 | 55                         |
| MWE                 | 55                         |
| MWC                 | 33                         |
| Fuel                | Solar                      |
| Basecase Study Year | 2023                       |

#### 2.1 Point of Interconnection

AF1-083 will interconnect with the EKPC transmission system tapping the Green County to Saloma 161 kV line.

#### 2.2 Cost Summary

The AF1-083 project will be responsible for the following costs:

| Description                            | Total Cost  |
|--|-------------|
| Attachment Facilities                  | \$610,000   |
| Direct Connection Network Upgrade      | \$5,420,000 |
| Non Direct Connection Network Upgrades | \$2,110,000 |
| Total Costs                            | \$8,140,000 |

In addition, the AF1-083 project may be responsible for a contribution to the following costs

| Description     | Total Cost |
|-----------------|------------|
| System Upgrades | \$670,000  |

Cost allocations for these upgrades will be provided in the System Impact Study Report.

## 3 Transmission Owner Scope of Work

#### **4** Attachment Facilities

The total preliminary cost estimate for the Attachment work is given in the table below. These costs do not include CIAC Tax Gross-up.

| Description   | Total Cost |
|---|------------|
| Install necessary equipment (a 161 kV isolation switch structure and associated switch,<br>plus interconnection metering, fiber-optic connection and telecommunications<br>equipment, circuit breaker and associated switches, and relay panel) at the new North<br>Taylor County switching station, to accept the IC generator lead line/bus (Estimated<br>time to implement is 24 months) | \$610,000  |
| Total Attachment Facility Costs   | \$610,000  |

#### 5 Direct Connection Cost Estimate

The total preliminary cost estimate for the Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

| Description   | Total Cost  |
|---|-------------|
| Construct a new 161 kV switching station (North Taylor County Switching) to facilitate connection of the IC solar generation project to the existing Green County-Saloma 161 kV line (Estimated time to implement is 24 months) | \$5,420,000 |
| Total Direct Connection Facility Costs  | \$5,420,000 |

## 6 Non-Direct Connection Cost Estimate

The total preliminary cost estimate for the Non-Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

| Description  | Total Cost  |
|--|-------------|
| Construct facilities to loop the existing Green County-Saloma 161 kV line into the new<br>North Taylor County switching station (Estimated time to implement is 24 months) | \$560,000   |
| Modify relays and/or settings at Green County substation for the existing line to the new North Taylor County switching station (Estimated time to implement is 9 months)  | \$70,000    |
| Modify relays and/or settings at Marion County substation for the existing line to the new North Taylor County switching station (Estimated time to implement is 9 months) | \$70,000    |
| Install OPGW on the North Taylor County-Green County 161 kV line (11.5 miles)<br>(Estimated time to implement is 16 months)  | \$1,410,000 |
| Total Non-Direct Connection Facility Costs   | \$2,110,000 |

## 7 Incremental Capacity Transfer Rights (ICTRs)

Will be determined at a later study phase

#### **1** Interconnection Customer Requirements

- 1. An Interconnection Customer entering the New Services Queue on or after October 1, 2012 with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.
- 2. The Interconnection Customer may be required to install and/or pay for metering as necessary to properly track real time output of the facility as well as installing metering which shall be used for billing purposes. See Section 8 of Appendix 2 to the Interconnection Service Agreement as well as Section 4 of PJM Manual 14D for additional information.

## 2 Revenue Metering and SCADA Requirements

#### 2.1 PJM Requirements

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Sections 24.1 and 24.2.

#### 2.2 **EKPC Requirements**

The Interconnection Customer will be required to comply with all EKPC Revenue Metering Requirements for Generation Interconnection Customers. The Revenue Metering Requirements may be found within the "EKPC Facility Connection Requirements" document located at the following link:

http://www.pjm.com/planning/design-engineering/to-tech-standards/ekpc.aspx

#### 8 Revenue Metering and SCADA Requirements

#### 8.1 **PJM Requirements**

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Section 8 of Attachment O.

#### 8.2 **EKPC Requirements**

[Please enter any TO revenue metering and SCADA Requirements]
#### 9 Network Impacts

The Queue Project AF1-083 was evaluated as a 55.0 MW (Capacity 33.0 MW) injection tapping the Green County to Saloma 161 kV line in the EKPC area. Project AF1-083 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-083 was studied with a commercial probability of 0.53. Potential network impacts were as follows:

### **Summer Peak Load Flow**

#### **10** Generation Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

#### **11 Multiple Facility Contingency**

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

None

#### **12** Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

| ID           | FROM<br>BUS# | FROM BUS         | kV        | FRO<br>M<br>BUS<br>AREA | TO<br>BUS# | TO BUS           | kV        | TO<br>BUS<br>ARE<br>A | CK<br>T<br>ID | CONT<br>NAME                            | Туре        | Ratin<br>g<br>MVA | PRE<br>PROJECT<br>LOADIN<br>G % | POST<br>PROJECT<br>LOADIN<br>G % | AC D<br>C | MW<br>IMPAC<br>T |
|--------------|--------------|------------------|-----------|-------------------------|------------|------------------|-----------|-----------------------|---------------|---|-------------|-------------------|---------------------------------|----------------------------------|-----------|------------------|
| 4097232<br>5 | 34228<br>6   | 2SOMERSE<br>T    | 69.0      | ЕКРС                    | 34228<br>7 | 2SOMERSE<br>T KU | 69.0      | ЕКРС                  | 1             | EKPC_P7<br>-1_COOP<br>161 DBL<br>2      | tower       | 115.0             | 114.37                          | 116.2                            | DC        | 4.66             |
| 4097222<br>5 | 34228<br>7   | 2SOMERSE<br>T KU | 69.0      | EKPC                    | 32453<br>1 | 2FERGUSO<br>N SO | 69.0      | LGEE                  | 1             | EKPC_P7<br>-1_COOP<br>161 DBL<br>2      | tower       | 105.0             | 126.74                          | 128.9                            | DC        | 5.02             |
| 4097226<br>2 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE                  | 1             | EKPC_P7<br>-<br>1_LAURL<br>161 DBL      | tower       | 277.0             | 118.22                          | 121.0                            | DC        | 7.68             |
| 4116957<br>9 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE                  | 1             | EKPC_P1<br>-<br>2_LAUR-<br>L<br>DAM161  | single      | 277.0             | 108.4                           | 110.07                           | DC        | 4.62             |
| 4150873<br>1 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE                  | 1             | EKPC_P4<br>-<br>5_LAURL<br>S50-<br>1024 | breake<br>r | 277.0             | 118.19                          | 120.96                           | DC        | 7.68             |

#### **13** Potential Congestion due to Local Energy Deliverability

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection

Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

| ID           | FROM<br>BUS# | FROM<br>BUS  | kV        | FRO<br>M<br>BUS<br>AREA | TO<br>BUS# | TO<br>BUS  | kV        | TO<br>BUS<br>ARE<br>A | CK<br>T<br>ID | CONT<br>NAME                       | Туре          | Ratin<br>g<br>MVA | PRE<br>PROJECT<br>LOADIN<br>G % | POST<br>PROJECT<br>LOADIN<br>G % | AC D<br>C | MW<br>IMPAC<br>T |
|--------------|--------------|--------------|-----------|-------------------------|------------|------------|-----------|-----------------------|---------------|------------------------------------|---------------|-------------------|---------------------------------|----------------------------------|-----------|------------------|
| 4116957<br>7 | 34271<br>8   | 5COOPER<br>2 | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIH<br>U | 161.<br>0 | LGEE                  | 1             | EKPC_P1<br>-2_LAUR-<br>L<br>DAM161 | operatio<br>n | 277.0             | 118.02                          | 120.8                            | DC        | 7.7              |
| 4116958<br>0 | 34271<br>8   | 5COOPER<br>2 | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIH<br>U | 161.<br>0 | LGEE                  | 1             | Base<br>Case                       | operatio<br>n | 219.0             | 100.53                          | 103.54                           | DC        | 6.6              |

### **14 System Reinforcements**

| ID                             | Index | Facility  | Upgrade Description   | Cost      |
|--------------------------------|-------|---|---|-----------|
| 40972325                       | 1     | 2SOMERSET 69.0 kV -<br>2SOMERSET KU 69.0 kV<br>Ckt 1    | r0080 (82) : Replace the 500 MCM copper jumpers at the<br>Somerset substation using 750 MCM copper or equivalent<br>Project Type : FAC<br>Cost : \$10,000<br>Time Estimate : 6.0 Months   | \$10,000  |
| 40972225                       | 2     | 2SOMERSET KU 69.0 kV -<br>2FERGUSON SO 69.0 kV<br>Ckt 1 | r0077 (79) : LGEE violation (non PJM area). EKPC emergency<br>rating is 152 MVA.<br>The external (i.e. Non-PJM) Transmission Owner, LGEE, will<br>not evaluate this violation until the impact study phase.<br>Project Type : FAC<br>Cost : \$0<br>Time Estimate : 0.0 Months | \$0       |
| 41508731,41169579,<br>40972262 | 3     | 5COOPER2 161.0 kV -<br>5ELIHU 161.0 kV Ckt 1            | r0076 (78) : Increase the maximum operating temperature of<br>the 795 MCM ACSR conductor in the Cooper-Elihu 161 kV line<br>section to 275 degrees F (6.7 miles)<br>Project Type : FAC<br>Cost : \$660,000<br>Time Estimate : 9.0 Months                                      | \$660,000 |
|                                |       |   | TOTAL COST  | \$670,000 |

#### **15 Flow Gate Details**

The following indices contain additional information about each flowgate presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. However, the intent of the appendix section is to provide more information on which projects/generators have contributions to the flowgate in question. Although this information is not used "as is" for cost allocation purposes, it can be used to gage other generators impact. It should be noted the generator contributions presented in the appendices sections are full contributions, whereas in the body of the report, those contributions take into consideration the commercial probability of each project.

#### 15.1 Index 1

| ID       | FROM<br>BUS# | FROM BUS  | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS          | TO BUS<br>AREA | CKT ID | CONT<br>NAME                       | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-----------|---------------------|------------|-----------------|----------------|--------|------------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972325 | 342286       | 2SOMERSET | EKPC                | 342287     | 2SOMERSET<br>KU | EKPC           | 1      | EKPC_P7-<br>1_COOP<br>161 DBL<br>2 | tower | 115.0         | 114.37                         | 116.2                           | DC    | 4.66         |

| Bus #       | Bus                                   | MW Impact |  |  |  |
|-------------|---------------------------------------|-----------|--|--|--|
| 342900      | 1COOPER1 G                            | 4.4802    |  |  |  |
| 342903      | 1COOPER2 G                            | 8.6895    |  |  |  |
| 939131      | AE1-143 C                             | 5.3375    |  |  |  |
| 939132      | AE1-143 E                             | 2.6438    |  |  |  |
| 940041      | AE1-246 C O1                          | 4.2392    |  |  |  |
| 940042      | AE1-246 E O1                          | 2.0644    |  |  |  |
| 940051      | AE1-247 C O1                          | 7.2019    |  |  |  |
| 940052      | AE1-247 E O1                          | 3.5668    |  |  |  |
| 940831      | AE2-071 C                             | 1.2979    |  |  |  |
| 940832      | AE2-071 E                             | 0.8652    |  |  |  |
| 943701      | AF1-038 C                             | 6.1942    |  |  |  |
| 943702      | AF1-038 E                             | 4.1294    |  |  |  |
| 943821      | AF1-050 C                             | 1.1896    |  |  |  |
| 943822      | AF1-050 E                             | 0.7931    |  |  |  |
| 944151      | AF1-083 C O1                          | 1.2604    |  |  |  |
| 944152      | AF1-083 E O1                          | 0.8403    |  |  |  |
| 944511      | AF1-116 C                             | 3.1726    |  |  |  |
| 944512      | AF1-116 E                             | 2.1150    |  |  |  |
| 944981      | AF1-163 C O1 (Withdrawn : 12/11/2019) | 2.1292    |  |  |  |
| 944982      | AF1-163 E O1 (Withdrawn : 12/11/2019) | 1.2371    |  |  |  |
| 945381      | AF1-203 C                             | 0.3931    |  |  |  |
| 945382      | AF1-203 E                             | 0.2620    |  |  |  |
| LGEE        | LGEE                                  | 0.0120    |  |  |  |
| CPLE        | CPLE                                  | 0.0304    |  |  |  |
| WEC         | WEC                                   | 0.0479    |  |  |  |
| LGE-0012019 | LGE-0012019                           | 5.0391    |  |  |  |
| CBM-W2      | CBM-W2                                | 3.5463    |  |  |  |
| NY          | NY                                    | 0.0431    |  |  |  |
| CBM-W1      | CBM-W1                                | 1.6763    |  |  |  |
| TVA         | TVA                                   | 1.0696    |  |  |  |
| O-066       | O-066                                 | 0.5242    |  |  |  |
| CBM-S2      | CBM-S2                                | 0.5953    |  |  |  |
| CBM-S1      | CBM-S1                                | 5.3335    |  |  |  |
| G-007       | G-007                                 | 0.0811    |  |  |  |
| MADISON     | MADISON                               | 0.7540    |  |  |  |
| MEC         | MEC                                   | 0.4481    |  |  |  |

#### 15.2 Index 2

| ID       | FROM<br>BUS# | FROM BUS        | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS          | TO BUS<br>AREA | CKT ID | CONT<br>NAME                       | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-----------------|---------------------|------------|-----------------|----------------|--------|------------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972225 | 342287       | 2SOMERSET<br>KU | EKPC                | 324531     | 2FERGUSON<br>SO | LGEE           | 1      | EKPC_P7-<br>1_COOP<br>161 DBL<br>2 | tower | 105.0         | 126.74                         | 128.9                           | DC    | 5.02         |

| Bus #       | Bus                                   | MW Impact |  |  |  |
|-------------|---------------------------------------|-----------|--|--|--|
| 342900      | 1COOPER1 G                            | 4.3847    |  |  |  |
| 342903      | 1COOPER2 G                            | 8.5042    |  |  |  |
| 939131      | AE1-143 C                             | 6.4726    |  |  |  |
| 939132      | AE1-143 E                             | 3.2061    |  |  |  |
| 940041      | AE1-246 C O1                          | 5.3429    |  |  |  |
| 940042      | AE1-246 E O1                          | 2.6019    |  |  |  |
| 940051      | AE1-247 C O1                          | 9.0769    |  |  |  |
| 940052      | AE1-247 E O1                          | 4.4954    |  |  |  |
| 940831      | AE2-071 C                             | 1.6418    |  |  |  |
| 940832      | AE2-071 E                             | 1.0946    |  |  |  |
| 943701      | AF1-038 C                             | 8.4535    |  |  |  |
| 943702      | AF1-038 E                             | 5.6357    |  |  |  |
| 943821      | AF1-050 C                             | 1.3743    |  |  |  |
| 943822      | AF1-050 E                             | 0.9162    |  |  |  |
| 944151      | AF1-083 C O1                          | 1.3582    |  |  |  |
| 944152      | AF1-083 E O1                          | 0.9055    |  |  |  |
| 944511      | AF1-116 C                             | 7.2590    |  |  |  |
| 944512      | AF1-116 E                             | 4.8394    |  |  |  |
| 944981      | AF1-163 C O1 (Withdrawn : 12/11/2019) | 2.6865    |  |  |  |
| 944982      | AF1-163 E O1 (Withdrawn : 12/11/2019) | 1.5610    |  |  |  |
| 945381      | AF1-203 C                             | 0.4972    |  |  |  |
| 945382      | AF1-203 E                             | 0.3315    |  |  |  |
| CPLE        | CPLE                                  | 0.0642    |  |  |  |
| WEC         | WEC                                   | 0.0617    |  |  |  |
| LGE-0012019 | LGE-0012019                           | 5.1436    |  |  |  |
| CBM-W2      | CBM-W2                                | 4.6028    |  |  |  |
| NY          | NY                                    | 0.0442    |  |  |  |
| CBM-W1      | CBM-W1                                | 2.1893    |  |  |  |
| TVA         | TVA                                   | 1.4140    |  |  |  |
| O-066       | O-066                                 | 0.5174    |  |  |  |
| CBM-S2      | CBM-S2                                | 1.0057    |  |  |  |
| CBM-S1      | CBM-S1                                | 6.9779    |  |  |  |
| G-007       | G-007                                 | 0.0801    |  |  |  |
| MADISON     | MADISON                               | 0.9919    |  |  |  |
| MEC         | MEC                                   | 0.5800    |  |  |  |

#### 15.3 Index 3

| ID       | FROM<br>BUS# | FROM<br>BUS | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS | TO BUS<br>AREA | CKT ID | CONT<br>NAME                   | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-------------|---------------------|------------|--------|----------------|--------|--------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972262 | 342718       | 5COOPER2    | EKPC                | 324141     | 5ELIHU | LGEE           | 1      | EKPC_P7-<br>1_LAURL<br>161 DBL | tower | 277.0         | 118.22                         | 121.0                           | DC    | 7.68         |

| Bus #       | Bus                                   | MW Impact |  |  |  |
|-------------|---------------------------------------|-----------|--|--|--|
| 342900      | 1COOPER1 G                            | 8.9959    |  |  |  |
| 342903      | 1COOPER2 G                            | 17.5008   |  |  |  |
| 342945      | 1LAUREL 1G                            | 5.4447    |  |  |  |
| 939131      | AE1-143 C                             | 10.0845   |  |  |  |
| 939132      | AE1-143 E                             | 4.9951    |  |  |  |
| 940041      | AE1-246 C O1                          | 9.0965    |  |  |  |
| 940042      | AE1-246 E O1                          | 4.4299    |  |  |  |
| 940051      | AE1-247 C O1                          | 15.4539   |  |  |  |
| 940052      | AE1-247 E O1                          | 7.6537    |  |  |  |
| 940831      | AE2-071 C                             | 2.5752    |  |  |  |
| 940832      | AE2-071 E                             | 1.7168    |  |  |  |
| 943701      | AF1-038 C                             | 6.6859    |  |  |  |
| 943702      | AF1-038 E                             | 4.4573    |  |  |  |
| 943821      | AF1-050 C                             | 4.5500    |  |  |  |
| 943822      | AF1-050 E                             | 3.0334    |  |  |  |
| 944151      | AF1-083 C O1                          | 4.6078    |  |  |  |
| 944152      | AF1-083 E O1                          | 3.0719    |  |  |  |
| 944511      | AF1-116 C                             | 11.3098   |  |  |  |
| 944512      | AF1-116 E                             | 7.5398    |  |  |  |
| 944981      | AF1-163 C O1 (Withdrawn : 12/11/2019) | 8.6420    |  |  |  |
| 944982      | AF1-163 E O1 (Withdrawn : 12/11/2019) | 5.0212    |  |  |  |
| 945381      | AF1-203 C                             | 1.4716    |  |  |  |
| 945382      | AF1-203 E                             | 0.9810    |  |  |  |
| CPLE        | CPLE                                  | 0.0886    |  |  |  |
| WEC         | WEC                                   | 0.0728    |  |  |  |
| LGE-0012019 | LGE-0012019                           | 7.9453    |  |  |  |
| CBM-W2      | CBM-W2                                | 6.5438    |  |  |  |
| NY          | NY                                    | 0.0912    |  |  |  |
| CBM-W1      | CBM-W1                                | 2.5020    |  |  |  |
| TVA         | TVA                                   | 2.1098    |  |  |  |
| O-066       | O-066                                 | 1.0685    |  |  |  |
| CBM-S2      | CBM-S2                                | 1.4912    |  |  |  |
| CBM-S1      | CBM-S1                                | 10.2410   |  |  |  |
| G-007       | G-007                                 | 0.1654    |  |  |  |
| MADISON     | MADISON                               | 1.5745    |  |  |  |
| MEC         | MEC                                   | 0.7802    |  |  |  |

## **Affected Systems**

#### **16 Affected Systems**

#### 16.1 LG&E

LG&E Impacts to be determined during later study phases (as applicable).

#### 16.2 MISO

MISO Impacts to be determined during later study phases (as applicable).

#### 16.3 TVA

TVA Impacts to be determined during later study phases (as applicable).

#### **16.4 Duke Energy Progress**

Duke Energy Progress Impacts to be determined during later study phases (as applicable).

#### **16.5 NYISO**

NYISO Impacts to be determined during later study phases (as applicable).

### **17** Contingency Descriptions

| Contingency Name         | Contingency Definition  |  |
|--------------------------|---|--|
| EKPC_P1-2_LAUR-L DAM161  | CONTINGENCY 'EKPC_P1-2_LAUR-L DAM161'<br>OPEN BRANCH FROM BUS 342754 TO BUS 342757 CKT 1<br>5LAUREL DAM 161.00<br>END   | /* LAUREL CO - LAUREL DAM<br>/* 342754 5LAUREL CO 161.00 342757  |
| Base Case                |   |  |
| EKPC_P4-5_LAURL          | CONTINGENCY 'EKPC_P4-5_LAURL S50-1024'<br>OPEN BUS 342754 /* 5LAUREL C<br>OPEN BRANCH FROM BUS 324688 TO BUS 342781 CKT 1<br>5PITTSBURG 161.00<br>OPEN BRANCH FROM BUS 342781 TO BUS 342820 CKT 1<br>5TYNER 161.00<br>END   | /* LAUREL CO<br>O DROPS BUS<br>/* 324688 2PITTSKU 69.000 342781<br>/* 342781 5PITTSBURG 161.00 342820  |
| EKPC_P7-1_LAURL 161 DBL  | CONTINGENCY 'EKPC_P7-1_LAURL 161 DBL'<br>CO - TYNER 161<br>OPEN BRANCH FROM BUS 342754 TO BUS 342757 CKT 1<br>5LAUREL DAM 161.00<br>OPEN BRANCH FROM BUS 342754 TO BUS 342781 CKT 1<br>5PITTSBURG 161.00<br>OPEN BRANCH FROM BUS 342781 TO BUS 342820 CKT 1<br>5TYNER 161.00<br>END | /* LAUREL CO - LAUREL DAM 161 & LAUREL<br>/* 342754 5LAUREL CO 161.00 342757<br>/* 342754 5LAUREL CO 161.00 342781<br>/* 342781 5PITTSBURG 161.00 342820 |
| EKPC_P7-1_COOP 161 DBL 2 | CONTINGENCY 'EKPC_P7-1_COOP 161 DBL 2'<br>DAM 161<br>OPEN BRANCH FROM BUS 324141 TO BUS 342718 CKT 1<br>5COOPER2 161.00<br>OPEN BRANCH FROM BUS 342718 TO BUS 342757 CKT 1<br>5LAUREL DAM 161.00<br>END   | /* COOPER - ELIHU 161 & COOPER - LAUREL<br>/* 324141 5ELIHU 161.00 342718<br>/* 342718 5COOPER2 161.00 342757  |

# **Short Circuit**

#### **18 Short Circuit**

The following Breakers are overduty

| Bus Number | Bus Name | BREAKER | Туре | Capacity<br>(Amps) | Duty<br>Percentage<br>Post Queue | Duty<br>Percentage Pre<br>Queue |
|------------|----------|---------|------|--------------------|----------------------------------|---------------------------------|
|            |          |         |      |                    |                                  |                                 |

# **Secondary Point of Interconnection**

#### **19 Network Impacts – secondary POI**

The Queue Project AF1-083 was evaluated as a 55.0 MW (Capacity 33.0 MW) injection tapping the Green County to Saloma 161 kV line in the EKPC area. Project AF1-083 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-083 was studied with a commercial probability of 0.53. Potential network impacts were as follows:

### **Summer Peak Load Flow**

#### **20** Generation Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

#### 21 Multiple Facility Contingency

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

None

#### **22** Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

| ID           | FROM<br>BUS# | FROM BUS         | kV        | FRO<br>M<br>BUS<br>AREA | TO<br>BUS# | TO BUS           | kV        | TO<br>BUS<br>ARE<br>A | CK<br>T<br>ID | CONT<br>NAME                            | Туре        | Ratin<br>g<br>MVA | PRE<br>PROJECT<br>LOADIN<br>G % | POST<br>PROJECT<br>LOADIN<br>G % | AC D<br>C | MW<br>IMPAC<br>T |
|--------------|--------------|------------------|-----------|-------------------------|------------|------------------|-----------|-----------------------|---------------|---|-------------|-------------------|---------------------------------|----------------------------------|-----------|------------------|
| 4097232<br>5 | 34228<br>6   | 2SOMERSE<br>T    | 69.0      | EKPC                    | 34228<br>7 | 2SOMERSE<br>T KU | 69.0      | EKPC                  | 1             | EKPC_P7<br>-1_COOP<br>161 DBL<br>2      | tower       | 115.0             | 114.37                          | 116.2                            | DC        | 4.65             |
| 4097222<br>5 | 34228<br>7   | 2SOMERSE<br>T KU | 69.0      | EKPC                    | 32453<br>1 | 2FERGUSO<br>N SO | 69.0      | LGEE                  | 1             | EKPC_P7<br>-1_COOP<br>161 DBL<br>2      | tower       | 105.0             | 126.74                          | 128.9                            | DC        | 5.02             |
| 4097226<br>2 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE                  | 1             | EKPC_P7<br>-<br>1_LAURL<br>161 DBL      | tower       | 277.0             | 118.22                          | 120.99                           | DC        | 7.66             |
| 4116957<br>9 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE                  | 1             | EKPC_P1<br>-<br>2_LAUR-<br>L<br>DAM161  | single      | 277.0             | 108.4                           | 110.06                           | DC        | 4.61             |
| 4150873<br>1 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE                  | 1             | EKPC_P4<br>-<br>5_LAURL<br>S50-<br>1024 | breake<br>r | 277.0             | 118.19                          | 120.95                           | DC        | 7.66             |

#### 23 Potential Congestion due to Local Energy Deliverability

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection

Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

| ID           | FROM<br>BUS# | FROM<br>BUS  | kV        | FRO<br>M<br>BUS<br>AREA | TO<br>BUS# | TO<br>BUS  | kV        | TO<br>BUS<br>ARE<br>A | CK<br>T<br>ID | CONT<br>NAME                       | Туре          | Ratin<br>g<br>MVA | PRE<br>PROJECT<br>LOADIN<br>G % | POST<br>PROJECT<br>LOADIN<br>G % | AC D<br>C | MW<br>IMPAC<br>T |
|--------------|--------------|--------------|-----------|-------------------------|------------|------------|-----------|-----------------------|---------------|------------------------------------|---------------|-------------------|---------------------------------|----------------------------------|-----------|------------------|
| 4116957<br>7 | 34271<br>8   | 5COOPER<br>2 | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIH<br>U | 161.<br>0 | LGEE                  | 1             | EKPC_P1<br>-2_LAUR-<br>L<br>DAM161 | operatio<br>n | 277.0             | 118.02                          | 120.79                           | DC        | 7.68             |
| 4116958<br>0 | 34271<br>8   | 5COOPER<br>2 | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIH<br>U | 161.<br>0 | LGEE                  | 1             | Base<br>Case                       | operatio<br>n | 219.0             | 100.53                          | 103.54                           | DC        | 6.59             |

#### 24 Flow Gate Details

The following indices contain additional information about each flowgate presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. However, the intent of the appendix section is to provide more information on which projects/generators have contributions to the flowgate in question. Although this information is not used "as is" for cost allocation purposes, it can be used to gage other generators impact. It should be noted the generator contributions presented in the appendices sections are full contributions, whereas in the body of the report, those contributions take into consideration the commercial probability of each project.

#### 24.1 Index 1

| ID       | FROM<br>BUS# | FROM BUS  | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS          | TO BUS<br>AREA | CKT ID | CONT<br>NAME                       | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-----------|---------------------|------------|-----------------|----------------|--------|------------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972325 | 342286       | 2SOMERSET | EKPC                | 342287     | 2SOMERSET<br>KU | EKPC           | 1      | EKPC_P7-<br>1_COOP<br>161 DBL<br>2 | tower | 115.0         | 114.37                         | 116.2                           | DC    | 4.65         |

| Bus #       | Bus                                   | MW Impact |  |  |
|-------------|---------------------------------------|-----------|--|--|
| 342900      | 1COOPER1 G                            | 4.4802    |  |  |
| 342903      | 1COOPER2 G                            | 8.6895    |  |  |
| 939131      | AE1-143 C                             | 5.3375    |  |  |
| 939132      | AE1-143 E                             | 2.6438    |  |  |
| 940041      | AE1-246 C O1                          | 4.2392    |  |  |
| 940042      | AE1-246 E O1                          | 2.0644    |  |  |
| 940051      | AE1-247 C O1                          | 7.2019    |  |  |
| 940052      | AE1-247 E O1                          | 3.5668    |  |  |
| 940831      | AE2-071 C                             | 1.2979    |  |  |
| 940832      | AE2-071 E                             | 0.8652    |  |  |
| 943701      | AF1-038 C                             | 6.1942    |  |  |
| 943702      | AF1-038 E                             | 4.1294    |  |  |
| 943821      | AF1-050 C                             | 1.1896    |  |  |
| 943822      | AF1-050 E                             | 0.7931    |  |  |
| 944151      | AF1-083 C O2                          | 1.2571    |  |  |
| 944152      | AF1-083 E O2                          | 0.8381    |  |  |
| 944511      | AF1-116 C                             | 3.1726    |  |  |
| 944512      | AF1-116 E                             | 2.1150    |  |  |
| 944981      | AF1-163 C O2 (Withdrawn : 12/11/2019) | 2.1131    |  |  |
| 944982      | AF1-163 E O2 (Withdrawn : 12/11/2019) | 1.2278    |  |  |
| 945381      | AF1-203 C                             | 0.3931    |  |  |
| 945382      | AF1-203 E                             | 0.2620    |  |  |
| LGEE        | LGEE                                  | 0.0120    |  |  |
| CPLE        | CPLE                                  | 0.0304    |  |  |
| WEC         | WEC                                   | 0.0479    |  |  |
| LGE-0012019 | LGE-0012019                           | 5.0391    |  |  |
| CBM-W2      | CBM-W2                                | 3.5463    |  |  |
| NY          | NY                                    | 0.0431    |  |  |
| CBM-W1      | CBM-W1                                | 1.6763    |  |  |
| TVA         | TVA                                   | 1.0696    |  |  |
| O-066       | O-066                                 | 0.5242    |  |  |
| CBM-S2      | CBM-S2                                | 0.5953    |  |  |
| CBM-S1      | CBM-S1                                | 5.3335    |  |  |
| G-007       | G-007                                 | 0.0811    |  |  |
| MADISON     | MADISON                               | 0.7540    |  |  |
| MEC         | MEC                                   | 0.4481    |  |  |

#### 24.2 Index 2

| ID       | FROM<br>BUS# | FROM BUS        | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS          | TO BUS<br>AREA | CKT ID | CONT<br>NAME                       | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-----------------|---------------------|------------|-----------------|----------------|--------|------------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972225 | 342287       | 2SOMERSET<br>KU | ЕКРС                | 324531     | 2FERGUSON<br>SO | LGEE           | 1      | EKPC_P7-<br>1_COOP<br>161 DBL<br>2 | tower | 105.0         | 126.74                         | 128.9                           | DC    | 5.02         |

| Bus #       | Bus                                   | MW Impact |  |  |
|-------------|---------------------------------------|-----------|--|--|
| 342900      | 1COOPER1 G                            | 4.3847    |  |  |
| 342903      | 1COOPER2 G                            | 8.5042    |  |  |
| 939131      | AE1-143 C                             | 6.4726    |  |  |
| 939132      | AE1-143 E                             | 3.2061    |  |  |
| 940041      | AE1-246 C O1                          | 5.3429    |  |  |
| 940042      | AE1-246 E O1                          | 2.6019    |  |  |
| 940051      | AE1-247 C O1                          | 9.0769    |  |  |
| 940052      | AE1-247 E O1                          | 4.4954    |  |  |
| 940831      | AE2-071 C                             | 1.6418    |  |  |
| 940832      | AE2-071 E                             | 1.0946    |  |  |
| 943701      | AF1-038 C                             | 8.4535    |  |  |
| 943702      | AF1-038 E                             | 5.6357    |  |  |
| 943821      | AF1-050 C                             | 1.3743    |  |  |
| 943822      | AF1-050 E                             | 0.9162    |  |  |
| 944151      | AF1-083 C O2                          | 1.3560    |  |  |
| 944152      | AF1-083 E O2                          | 0.9040    |  |  |
| 944511      | AF1-116 C                             | 7.2590    |  |  |
| 944512      | AF1-116 E                             | 4.8394    |  |  |
| 944981      | AF1-163 C O2 (Withdrawn : 12/11/2019) | 2.6633    |  |  |
| 944982      | AF1-163 E O2 (Withdrawn : 12/11/2019) | 1.5474    |  |  |
| 945381      | AF1-203 C                             | 0.4972    |  |  |
| 945382      | AF1-203 E                             | 0.3315    |  |  |
| CPLE        | CPLE                                  | 0.0642    |  |  |
| WEC         | WEC                                   | 0.0617    |  |  |
| LGE-0012019 | LGE-0012019                           | 5.1436    |  |  |
| CBM-W2      | CBM-W2                                | 4.6028    |  |  |
| NY          | NY                                    | 0.0442    |  |  |
| CBM-W1      | CBM-W1                                | 2.1893    |  |  |
| TVA         | TVA                                   | 1.4140    |  |  |
| O-066       | O-066                                 | 0.5174    |  |  |
| CBM-S2      | CBM-S2                                | 1.0057    |  |  |
| CBM-S1      | CBM-S1                                | 6.9779    |  |  |
| G-007       | G-007                                 | 0.0801    |  |  |
| MADISON     | MADISON                               | 0.9919    |  |  |
| MEC         | MEC                                   | 0.5800    |  |  |

#### 24.3 Index 3

| ID       | FROM<br>BUS# | FROM<br>BUS | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS | TO BUS<br>AREA | CKT ID | CONT<br>NAME                    | Туре    | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-------------|---------------------|------------|--------|----------------|--------|---------------------------------|---------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 41508731 | 342718       | 5COOPER2    | EKPC                | 324141     | 5ELIHU | LGEE           | 1      | EKPC_P4-<br>5_LAURL<br>S50-1024 | breaker | 277.0         | 118.19                         | 120.95                          | DC    | 7.66         |

| Bus #       | Bus                                   | MW Impact |
|-------------|---------------------------------------|-----------|
| 342900      | 1COOPER1 G                            | 8.9959    |
| 342903      | 1COOPER2 G                            | 17.5008   |
| 342945      | 1LAUREL 1G                            | 5.4447    |
| 939131      | AE1-143 C                             | 10.0845   |
| 939132      | AE1-143 E                             | 4.9951    |
| 940041      | AE1-246 C O1                          | 9.0965    |
| 940042      | AE1-246 E O1                          | 4.4299    |
| 940051      | AE1-247 C O1                          | 15.4539   |
| 940052      | AE1-247 E O1                          | 7.6537    |
| 940831      | AE2-071 C                             | 2.5752    |
| 940832      | AE2-071 E                             | 1.7168    |
| 943701      | AF1-038 C                             | 6.6859    |
| 943702      | AF1-038 E                             | 4.4573    |
| 943821      | AF1-050 C                             | 4.5500    |
| 943822      | AF1-050 E                             | 3.0334    |
| 944151      | AF1-083 C O2                          | 4.5985    |
| 944152      | AF1-083 E O2                          | 3.0657    |
| 944511      | AF1-116 C                             | 11.3098   |
| 944512      | AF1-116 E                             | 7.5398    |
| 944981      | AF1-163 C O2 (Withdrawn : 12/11/2019) | 8.5554    |
| 944982      | AF1-163 E O2 (Withdrawn : 12/11/2019) | 4.9710    |
| 945381      | AF1-203 C                             | 1.4716    |
| 945382      | AF1-203 E                             | 0.9810    |
| CPLE        | CPLE                                  | 0.0886    |
| WEC         | WEC                                   | 0.0728    |
| LGE-0012019 | LGE-0012019                           | 7.9453    |
| CBM-W2      | CBM-W2                                | 6.5438    |
| NY          | NY                                    | 0.0912    |
| CBM-W1      | CBM-W1                                | 2.5020    |
| TVA         | TVA                                   | 2.1098    |
| O-066       | O-066                                 | 1.0685    |
| CBM-S2      | CBM-S2                                | 1.4912    |
| CBM-S1      | CBM-S1                                | 10.2410   |
| G-007       | G-007                                 | 0.1654    |
| MADISON     | MADISON                               | 1.5745    |
| MEC         | MEC                                   | 0.7802    |

## **Affected Systems**

#### **25** Affected Systems

#### 25.1 LG&E

LG&E Impacts to be determined during later study phases (as applicable).

#### 25.2 MISO

MISO Impacts to be determined during later study phases (as applicable).

#### 25.3 TVA

TVA Impacts to be determined during later study phases (as applicable).

#### **25.4 Duke Energy Progress**

Duke Energy Progress Impacts to be determined during later study phases (as applicable).

#### **25.5 NYISO**

NYISO Impacts to be determined during later study phases (as applicable).

### **26 Contingency Descriptions**

| Contingency Name         | Contingency Definition  |  |
|--------------------------|---|--|
| EKPC_P1-2_LAUR-L DAM161  | CONTINGENCY 'EKPC_P1-2_LAUR-L DAM161'<br>OPEN BRANCH FROM BUS 342754 TO BUS 342757 CKT 1<br>5LAUREL DAM 161.00<br>END   | /* LAUREL CO - LAUREL DAM<br>/* 342754 5LAUREL CO 161.00 342757  |
| Base Case                |   |  |
| EKPC_P4-5_LAURL          | CONTINGENCY 'EKPC_P4-5_LAURL S50-1024'<br>OPEN BUS 342754 /* 5LAUREL COPEN BRANCH FROM BUS 324688 TO BUS 342781 CKT 1<br>SPITTSBURG 161.00<br>OPEN BRANCH FROM BUS 342781 TO BUS 342820 CKT 1<br>STYNER 161.00<br>END   | /* LAUREL CO<br>CO DROPS BUS<br>/* 324688 2PITTSKU 69.000 342781<br>/* 342781 5PITTSBURG 161.00 342820   |
| EKPC_P7-1_LAURL 161 DBL  | CONTINGENCY 'EKPC_P7-1_LAURL 161 DBL'<br>CO - TYNER 161<br>OPEN BRANCH FROM BUS 342754 TO BUS 342757 CKT 1<br>SLAUREL DAM 161.00<br>OPEN BRANCH FROM BUS 342754 TO BUS 342781 CKT 1<br>SPITTSBURG 161.00<br>OPEN BRANCH FROM BUS 342781 TO BUS 342820 CKT 1<br>STYNER 161.00<br>END | /* LAUREL CO - LAUREL DAM 161 & LAUREL<br>/* 342754 5LAUREL CO 161.00 342757<br>/* 342754 5LAUREL CO 161.00 342781<br>/* 342781 5PITTSBURG 161.00 342820 |
| EKPC_P7-1_COOP 161 DBL 2 | CONTINGENCY 'EKPC_P7-1_COOP 161 DBL 2'<br>DAM 161<br>OPEN BRANCH FROM BUS 324141 TO BUS 342718 CKT 1<br>5COOPER2 161.00<br>OPEN BRANCH FROM BUS 342718 TO BUS 342757 CKT 1<br>5LAUREL DAM 161.00<br>END   | /* COOPER - ELIHU 161 & COOPER - LAUREL<br>/* 324141 5ELIHU 161.00 342718<br>/* 342718 5COOPER2 161.00 342757  |

# **Short Circuit**

#### 27 Short Circuit

The following Breakers are overduty

| Bus Number | Bus Name | BREAKER | Туре | Capacity<br>(Amps) | Duty<br>Percentage<br>Post Queue | Duty<br>Percentage Pre<br>Queue |
|------------|----------|---------|------|--------------------|----------------------------------|---------------------------------|
|            |          |         |      |                    |                                  |                                 |

#### 28 Single Line Diagram



Attachment M PJM Interconnection System Impact Study Report



# Generation Interconnection System Impact Study Report for Queue Project AF1-083 GREEN COUNTY-SALOMA 161 KV 33 MW Capacity / 55 MW Energy

August, 2020

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#### **1** Introduction

This System Impact Study has been prepared in accordance with the PJM Open Access Transmission Tariff, 205, as well as the System Impact Study Agreement between the Interconnection Customer (IC), and PJM Interconnection, LLC (PJM), Transmission Provider (TP). The Interconnected Transmission Owner (ITO) is EKPC.

#### 2 Preface

The intent of the System Impact Study is to determine a plan, with approximate cost and construction time estimates, to connect the subject generation interconnection project to the PJM network at a location specified by the Interconnection Customer. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system. All facilities required for interconnection of a generation interconnection project must be designed to meet the technical specifications (on PJM web site) for the appropriate transmission owner.

In some instances an Interconnection Customer may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection or merchant transmission upgrade, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the Feasibility Study, but the actual allocation will be deferred until the System Impact Study is performed.

The System Impact Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

The Interconnection Customer seeking to interconnect a wind or solar generation facility shall maintain meteorological data facilities as well as provide that meteorological data which is required per Schedule H to the Interconnection Service Agreement and Section 8 of Manual 14D.

#### 3 General

The Interconnection Customer (IC), has proposed a Solar; Storage generating facility located in Taylor County, West Virginia. The installed facilities will have a total capability of 55 MW with 33 MW of this output being recognized by PJM as Capacity.

The proposed in-service date for this project is December 31, 2022. This study does not imply a TO commitment to this in-service date.

The objective of this System Impact Study is to determine budgetary cost estimates and approximate construction timelines for identified transmission facilities required to connect the proposed generating facilities to the ITO transmission system. These reinforcements include the Attachment Facilities, Local Upgrades, and Network Upgrades required for maintaining the reliability of the ITO transmission system.

| Queue Number        | AF1-083                    |
|---------------------|----------------------------|
| Project Name        | GREEN COUNTY-SALOMA 161 KV |
| State               | West Virginia              |
| County              | Taylor                     |
| Transmission Owner  | ЕКРС                       |
| MFO                 | 55                         |
| MWE                 | 55                         |
| MWC                 | 33                         |
| Fuel                | Solar; Storage             |
| Basecase Study Year | 2023                       |

Any new service customers who can feasibly be commercially operable prior to June 1st of the basecase study year are required to request interim deliverability analysis.

#### 4 Point of Interconnection

AF1-083 will interconnect with the EKPC transmission system tapping the Green County to Saloma 161 kV line.

#### 5 Cost Summary

The AF1-083 project will be responsible for the following costs:

| Description                                     | Total Cost  |
|---|-------------|
| Attachment Facilities                           | \$610,000   |
| Direct Connection Network Upgrade               | \$5,420,000 |
| Non Direct Connection Network Upgrades          | \$2,110,000 |
| Allocation for New System Upgrades*             | \$0         |
| Contribution to Previously Identified Upgrades* | \$0         |
| Total Costs                                     | \$8,140,000 |

\*As your project progresses through the study process and other projects modify their request or withdraw, then your cost allocation could change.

This cost excludes a Federal Income Tax Gross Up charges. This tax may or may not be charged based on whether this project meets the eligibility requirements of IRS Notice 88-129. If at a future date it is determined that the Federal Income Tax Gross charge is required, the Transmission Owner shall be reimbursed by the Interconnection Customer for such taxes.

Note 1: PJM Open Access Transmission Tariff (OATT) section 217.3A outline cost allocation rules. The rules are further clarified in PJM Manual 14A Attachment B. The allocation of costs for a network upgrade will start with the first Queue project to cause the need for the upgrade. Later queue projects will receive cost allocation contingent on their contribution to the violation and are allocated to the queues that have not closed less than 5 years following the execution of the first Interconnection Service Agreement which identifies the need for this upgrade.

Note 2: For customers with System Reinforcements listed: If your present cost allocation to a System Reinforcement indicates \$0, then please be aware that as changes to the interconnection process occur, such as prior queued projects withdrawing from the queue, reducing in size, etc, the cost responsibilities can change and a cost allocation may be assigned to your project. In addition, although your present cost allocation to a System Reinforcement is presently \$0, your project may need this system reinforcement completed to be deliverable to the PJM system. If your project comes into service prior to completion of the system reinforcement, an interim deliverability study for your project will be required.
# 6 Transmission Owner Scope of Work

### 6.1 Attachment Facilities

The total preliminary cost estimate for the Attachment work is given in the table below. These costs do not include CIAC Tax Gross-up.

| Description   | Total Cost |
|---|------------|
| Install necessary equipment (a 161 kV isolation switch structure and associated<br>switch, plus interconnection metering, fiber-optic connection and<br>telecommunications equipment, circuit breaker and associated switches, and<br>relay panel) at the new North Taylor County switching station, to accept the IC<br>generator lead line/bus (Estimated time to implement is 24 months) | \$610,000  |
| Total Attachment Facility Costs   | \$610,000  |

### 6.2 Direct Connection Cost Estimate

The total preliminary cost estimate for the Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

| Description   | Total Cost  |
|---|-------------|
| Construct a new 161 kV switching station (North Taylor County Switching) to facilitate connection of the IC solar generation project to the existing Green County-Saloma 161 kV line (Estimated time to implement is 24 months) | \$5,420,000 |
| Total Direct Connection Facility Costs  | \$5,420,000 |

### 6.3 Non-Direct Connection Cost Estimate

The total preliminary cost estimate for the Non-Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

| Description   | Total Cost |
|---|------------|
| Construct facilities to loop the existing Green County-Saloma 161 kV line into the new North Taylor County switching station (Estimated time to implement is 24 months) | \$560,000  |

| Description  | Total Cost  |
|--|-------------|
| Modify relays and/or settings at Green County substation for the existing line to the new North Taylor County switching station (Estimated time to implement is 9 months)  | \$70,000    |
| Modify relays and/or settings at Marion County substation for the existing line to the new North Taylor County switching station (Estimated time to implement is 9 months) | \$70,000    |
| Install OPGW on the North Taylor County-Green County 161 kV line (11.5 miles)<br>(Estimated time to implement is 16 months)  | \$1,410,000 |
| Total Non-Direct Connection Facility Costs   | \$2,110,000 |

# 7 Incremental Capacity Transfer Rights (ICTRs)

None

# 8 Interconnection Customer Requirements

It is understood that the Interconnection Customer is responsible for all costs associated with this interconnection. The costs above are reimbursable to the Interconnected Transmission Owner. The cost of the Interconnection Customer's generating plant and the costs for the line connecting the generating plant to the Interconnected Transmission Owner's Transmission circuit are not included in this report; these are assumed to be the Interconnection Customer's responsibility.

The Generation Interconnection Agreement does not in or by itself establish a requirement for the Interconnected Transmission Owner to provide power for consumption at the developer's facilities. A separate agreement may be reached with the local utility that provides service in the area to ensure that infrastructure is in place to meet this demand and proper metering equipment is installed. It is the responsibility of the developer to contact the local service provider to determine if a local service agreement is required.

Requirement from the PJM Open Access Transmission Tariff:

- An Interconnection Customer entering the New Services Queue on or after October 1, 2012 with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.
- The Interconnection Customer may be required to install and/or pay for metering as necessary to properly track real time output of the facility as well as installing metering which shall be used for billing purposes. See Section 8 of Appendix 2 to the Interconnection Service Agreement as well as Section 4 of PJM Manual 14D for additional information.

# 9 Revenue Metering and SCADA Requirements

### 9.1 PJM Requirements

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Section 8 of Attachment O.

# 9.2 Meteorological Data Reporting Requirements

The solar generation facility shall provide the Transmission Provider with site-specific meteorological data including:

- Back Panel temperature (Fahrenheit)
- Irradiance (Watts/meter<sup>2</sup>)
- Ambient air temperature (Fahrenheit) (Accepted, not required)
- Wind speed (meters/second) (Accepted, not required)
- Wind direction (decimal degrees from true north) (Accepted, not required)

### 9.3 Interconnected Transmission Owner Requirements

The IC will be required to comply with all Interconnected Transmission Owner's revenue metering requirements for generation interconnection customers located at the following link:

http://www.pjm.com/planning/design-engineering/to-tech-standards/

# **10** Summer Peak Analysis

The Queue Project AF1-083 was evaluated as a 55.0 MW (Capacity 33.0 MW) injection tapping the Green County to Saloma 161 kV line (specifically the Taylor County Jct – Saloma Tap 161 kV line segment) in the EKPC area. Project AF1-083 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-083 was studied with a commercial probability of 100.0 %. Potential network impacts were as follows:

### **10.1 Generation Deliverability**

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

### None

# **10.2 Multiple Facility Contingency**

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

### None

### **10.3 Contribution to Previously Identified Overloads**

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

| ID           | FROM<br>BUS# | FROM BUS         | kV        | FRO<br>M<br>BUS | TO<br>BUS# | TO BUS           | kV        | TO<br>BUS<br>ARE | СК<br>Т<br>ID | CONT<br>NAME                             | Туре        | Ratin<br>g<br>MVA | PRE<br>PROJEC<br>T | POST<br>PROJEC<br>T | AC D<br>C | MW<br>IMPAC<br>T |
|--------------|--------------|------------------|-----------|-----------------|------------|------------------|-----------|------------------|---------------|--|-------------|-------------------|--------------------|---------------------|-----------|------------------|
|              |              |                  |           | AREA            |            |                  |           | A                |               |  |             |                   | LOADIN<br>G %      | LOADIN<br>G %       |           |                  |
| 4097232<br>5 | 34228<br>6   | 2SOMERSE<br>T    | 69.0      | EKPC            | 34228<br>7 | 2SOMERSE<br>T KU | 69.0      | EKPC             | 1             | EKPC_P7<br>-1_COOP<br>161 DBL<br>2       | tower       | 115.0             | 106.59             | 110.14              | AC        | 4.66             |
| 4097222<br>5 | 34228<br>7   | 2SOMERSE<br>T KU | 69.0      | EKPC            | 32453<br>1 | 2FERGUSO<br>N SO | 69.0      | LGEE             | 1             | EKPC_P7<br>-1_COOP<br>161 DBL<br>2       | tower       | 105.0             | 117.59             | 121.74              | AC        | 5.03             |
| 4097226<br>2 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC            | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE             | 1             | EKPC_P7<br>-<br>1_LAURL<br>161 DBL       | tower       | 277.0             | 108.76             | 111.6               | AC        | 7.68             |
| 4116957<br>9 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC            | 32414<br>1 | SELIHU           | 161.<br>0 | LGEE             | 1             | EKPC_P1<br>-<br>2_LAUR-<br>L<br>DAM161   | single      | 277.0             | 101.41             | 103.12              | AC        | 4.62             |
| 4150873<br>1 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC            | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE             | 1             | EKPC_P4<br>-<br>5_LAURL<br>\$50-<br>1024 | breake<br>r | 277.0             | 108.76             | 111.61              | AC        | 7.68             |
| 4150873<br>2 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC            | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE             | 1             | EKPC_P4<br>-<br>5_LAURL<br>\$50-<br>1014 | breake<br>r | 277.0             | 108.45             | 111.3               | AC        | 7.69             |
| 4178182<br>1 | 34271<br>8   | 5COOPER2         | 161.<br>0 | EKPC            | 32414<br>1 | 5ELIHU           | 161.<br>0 | LGEE             | 1             | EKPC_P2<br>-<br>2_LAURE<br>L CO 161      | bus         | 277.0             | 108.45             | 111.3               | AC        | 7.69             |

# **10.4 Steady-State Voltage Requirements**

### None

# **10.5** Potential Congestion due to Local Energy Deliverability

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

| ID           | FROM<br>BUS# | FROM<br>BUS  | kV        | FRO<br>M<br>BUS<br>AREA | TO<br>BUS# | TO<br>BUS  | kV        | TO<br>BUS<br>ARE<br>A | СК<br>Т<br>ID | CONT<br>NAME                           | Туре          | Ratin<br>g<br>MVA | PRE<br>PROJECT<br>LOADIN<br>G % | POST<br>PROJECT<br>LOADIN<br>G % | AC D<br>C | MW<br>IMPAC<br>T |
|--------------|--------------|--------------|-----------|-------------------------|------------|------------|-----------|-----------------------|---------------|--|---------------|-------------------|---------------------------------|----------------------------------|-----------|------------------|
| 4116957<br>7 | 34271<br>8   | 5COOPER<br>2 | 161.<br>0 | EKPC                    | 32414<br>1 | 5ELIH<br>U | 161.<br>0 | LGEE                  | 1             | EKPC_P1<br>-<br>2_LAUR-<br>L<br>DAM161 | operatio<br>n | 277.0             | 108.44                          | 111.3                            | AC        | 7.7              |

### **10.6 System Reinforcements**

| ID   | ldx | Facility   | Upgrade Description  | Cost      | Cost<br>Allocated<br>to AF1-<br>083 | Upgrade<br>Number |
|--|-----|--|--|-----------|-------------------------------------|-------------------|
| 40972325   | 4   | 2SOMERSET<br>69.0 kV -<br>2SOMERSET KU<br>69.0 kV Ckt 1    | Upgrade the existing 500 MCM CU bus jumpers to 750 MCM CU. 6 month time estimate. New expected SE rating after the upgrade will be 152 MVA.<br>This line overload is presently driven by a prior queue cycle.  | \$250 K   | \$0                                 | N6232             |
| 40972225   | 5   | 2SOMERSET KU<br>69.0 kV -<br>2FERGUSON SO<br>69.0 kV Ckt 1 | EKPC: SE rating is 152 MVA. No EKPC upgrade required.<br>LG&E: SE rating is 83 MVA.<br>A LG&E affected system study will be required to<br>determine if LG&E upgrades are required on this line.<br>Preliminary upgrade, if determined to be required, is to<br>replace terminal equipment at a cost estimate of<br>\$897.613 K.   | \$0       | \$0                                 | N/A               |
| 41781821,4150<br>8731,41169579,<br>40972262,4150<br>8732 | 6   | 5COOPER2<br>161.0 kV -<br>5ELIHU 161.0 kV<br>Ckt 1         | <ul> <li>EKPC:</li> <li>EKPC SE rating is 298 MVA.</li> <li>Increase the operating temperature of the 795 MCM</li> <li>ACSR conductor from 212F to 275F (6.7 miles). EKPC's new SE rating would be 371 MVA. Cost estimate \$660K. PJM Network Upgrade N6238.</li> <li>Note: this EKPC upgrade may be dependent upon whether LG&amp;E determines if an LG&amp;E end upgrade is required on this line since the equipment which limits the overall line rating is LG&amp;E equipment. This will be determined with a LG&amp;E affected system study.</li> <li>LG&amp;E:</li> <li>LG&amp;E SE rating is 277 MVA.</li> <li>A LG&amp;E affected system study will be required to determine if LG&amp;E upgrades are required on this line.</li> <li>Preliminary upgrade, if determined to be required, is to upgrade the line conductor at a cost estimate of \$28.083 K. New LG&amp;E expected SE rating to be 335 MVA.</li> </ul> | \$660 K   | \$0                                 | N6238             |
|  |     |  | Total Cost   | \$860,000 | \$0                                 |                   |

Note : For customers with System Reinforcements listed: If your present cost allocation to a System Reinforcement indicates \$0, then please be aware that as changes to the interconnection process occur, such as prior queued projects withdrawing from the queue, reducing in size, etc, the cost responsibilities can change and a cost allocation may be assigned to your project. In addition, although your present cost allocation to a System Reinforcement is presently \$0, your project may need this system reinforcement completed to be deliverable to the PJM system. If your project comes into service prior to completion of the system reinforcement, an interim deliverability study for your project will be required.

### **10.7 Flow Gate Details**

The following indices contain additional information about each facility presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. The intent of the indices is to provide more details on which projects/generators have contributions to the flowgate in question. All New Service Queue Requests, through the end of the Queue under study, that are contributors to a flowgate will be listed in the indices. Please note that there may be contributors that are subsequently queued after the queue under study that are not listed in the indices. Although this information is not used "as is" for cost allocation purposes, it can be used to gage the impact of other projects/generators. It should be noted the project/generator MW contributions presented in the body of the report are Full MW Impact contributions which are also noted in the indices column named "Full MW Impact", whereas the loading percentages reported in the body of the report, take into consideration the PJM Generator Deliverability Test rules such as commercial probability of each project as well as the ramping impact of "Adder" contributions. The MW Impact found and used in the analysis is shown in the indices column named "Gendeliv MW Impact". 10.7.1 Index 1

None.

10.7.2 Index 2

None.

10.7.3 Index 3

None.

### 10.7.4 Index 4

| ID       | FROM<br>BUS# | FROM BUS  | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS          | TO<br>BUS<br>AREA | СКТ<br>ID | CONT<br>NAME                       | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-----------|---------------------|------------|-----------------|-------------------|-----------|------------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972325 | 342286       | 2SOMERSET | EKPC                | 342287     | 2SOMERSET<br>KU | EKPC              | 1         | EKPC_P7-<br>1_COOP<br>161 DBL<br>2 | tower | 115.0         | 106.59                         | 110.14                          | AC    | 4.66         |

| Bus #       | Bus          | Gendeliv MW Impact | Туре          | Full MW Impact |
|-------------|--------------|--------------------|---------------|----------------|
| 342900      | 1COOPER1 G   | 5.6852             | 50/50         | 5.6852         |
| 342903      | 1COOPER2 G   | 11.0266            | 50/50         | 11.0266        |
| 939131      | AE1-143 C    | 5.3386             | Adder         | 6.28           |
| 939132      | AE1-143 E    | 2.6443             | Adder         | 3.11           |
| 940041      | AE1-246 C O1 | 4.2405             | Adder         | 4.99           |
| 940042      | AE1-246 E O1 | 2.0651             | Adder         | 2.43           |
| 940831      | AE2-071 C    | 1.2982             | Adder         | 1.53           |
| 940832      | AE2-071 E    | 0.8655             | Adder         | 1.02           |
| 943701      | AF1-038 C    | 6.1949             | 50/50         | 6.1949         |
| 943702      | AF1-038 E    | 4.1299             | 50/50         | 4.1299         |
| 943821      | AF1-050 C    | 2.2451             | Adder         | 2.64           |
| 943822      | AF1-050 E    | 1.4967             | Adder         | 1.76           |
| 944151      | AF1-083 C O1 | 2.3786             | Adder         | 2.8            |
| 944152      | AF1-083 E O1 | 1.5858             | Adder         | 1.87           |
| 944511      | AF1-116 C    | 5.9872             | Adder         | 7.04           |
| 944512      | AF1-116 E    | 3.9915             | Adder         | 4.7            |
| 945381      | AF1-203 C    | 0.7418             | Adder         | 0.87           |
| 945382      | AF1-203 E    | 0.4946             | Adder         | 0.58           |
| WEC         | WEC          | 0.0482             | Confirmed LTF | 0.0482         |
| LGEE        | LGEE         | 0.0131             | Confirmed LTF | 0.0131         |
| CPLE        | CPLE         | 0.0318             | Confirmed LTF | 0.0318         |
| LGE-0012019 | LGE-0012019  | 5.0391             | LTF           | 5.0391         |
| CBM-W2      | CBM-W2       | 3.5872             | Confirmed LTF | 3.5872         |
| NY          | NY           | 0.0426             | Confirmed LTF | 0.0426         |
| TVA         | TVA          | 1.0724             | Confirmed LTF | 1.0724         |
| O-066       | O-066        | 0.5040             | Confirmed LTF | 0.5040         |
| CBM-S2      | CBM-S2       | 0.6069             | Confirmed LTF | 0.6069         |
| CBM-S1      | CBM-S1       | 5.3506             | Confirmed LTF | 5.3506         |
| G-007       | G-007        | 0.0780             | Confirmed LTF | 0.0780         |
| MADISON     | MADISON      | 0.7560             | Confirmed LTF | 0.7560         |
| MEC         | MEC          | 0.4513             | Confirmed LTF | 0.4513         |
| CBM-W1      | CBM-W1       | 1.7014             | Confirmed LTF | 1.7014         |

### 10.7.5 Index 5

| ID       | FROM<br>BUS# | FROM BUS        | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS          | TO<br>BUS<br>AREA | СКТ<br>ID | CONT<br>NAME                       | Туре  | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-----------------|---------------------|------------|-----------------|-------------------|-----------|------------------------------------|-------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 40972225 | 342287       | 2SOMERSET<br>KU | EKPC                | 324531     | 2FERGUSON<br>SO | LGEE              | 1         | EKPC_P7-<br>1_COOP<br>161 DBL<br>2 | tower | 105.0         | 117.59                         | 121.74                          | AC    | 5.03         |

| Bus #       | Bus          | Gendeliv MW Impact | Туре          | Full MW Impact |
|-------------|--------------|--------------------|---------------|----------------|
| 342900      | 1COOPER1 G   | 5.5640             | 50/50         | 5.5640         |
| 342903      | 1COOPER2 G   | 10.7915            | 50/50         | 10.7915        |
| 939131      | AE1-143 C    | 6.4733             | 50/50         | 6.4733         |
| 939132      | AE1-143 E    | 3.2064             | 50/50         | 3.2064         |
| 940041      | AE1-246 C O1 | 5.3436             | Adder         | 6.29           |
| 940042      | AE1-246 E O1 | 2.6022             | Adder         | 3.06           |
| 940831      | AE2-071 C    | 1.6422             | Adder         | 1.93           |
| 940832      | AE2-071 E    | 1.0948             | Adder         | 1.29           |
| 943701      | AF1-038 C    | 8.4539             | 50/50         | 8.4539         |
| 943702      | AF1-038 E    | 5.6359             | 50/50         | 5.6359         |
| 943821      | AF1-050 C    | 2.5937             | Adder         | 3.05           |
| 943822      | AF1-050 E    | 1.7291             | Adder         | 2.03           |
| 944151      | AF1-083 C O1 | 2.5632             | Adder         | 3.02           |
| 944152      | AF1-083 E O1 | 1.7088             | Adder         | 2.01           |
| 944511      | AF1-116 C    | 7.2598             | 50/50         | 7.2598         |
| 944512      | AF1-116 E    | 4.8398             | 50/50         | 4.8398         |
| 945381      | AF1-203 C    | 0.9384             | Adder         | 1.1            |
| 945382      | AF1-203 E    | 0.6256             | Adder         | 0.74           |
| WEC         | WEC          | 0.0621             | Confirmed LTF | 0.0621         |
| CPLE        | CPLE         | 0.0648             | Confirmed LTF | 0.0648         |
| LGE-0012019 | LGE-0012019  | 5.1436             | LTF           | 5.1436         |
| CBM-W2      | CBM-W2       | 4.6437             | Confirmed LTF | 4.6437         |
| NY          | NY           | 0.0431             | Confirmed LTF | 0.0431         |
| TVA         | TVA          | 1.4154             | Confirmed LTF | 1.4154         |
| O-066       | O-066        | 0.5107             | Confirmed LTF | 0.5107         |
| CBM-S2      | CBM-S2       | 1.0115             | Confirmed LTF | 1.0115         |
| CBM-S1      | CBM-S1       | 6.9864             | Confirmed LTF | 6.9864         |
| G-007       | G-007        | 0.0790             | Confirmed LTF | 0.0790         |
| MADISON     | MADISON      | 0.9959             | Confirmed LTF | 0.9959         |
| MEC         | MEC          | 0.5816             | Confirmed LTF | 0.5816         |
| CBM-W1      | CBM-W1       | 2.2143             | Confirmed LTF | 2.2143         |

### 10.7.6 Index 6

| ID       | FROM<br>BUS# | FROM<br>BUS | FROM<br>BUS<br>AREA | TO<br>BUS# | TO BUS | TO BUS<br>AREA | CKT ID | CONT<br>NAME                   | Туре | Rating<br>MVA | PRE<br>PROJECT<br>LOADING<br>% | POST<br>PROJECT<br>LOADING<br>% | AC DC | MW<br>IMPACT |
|----------|--------------|-------------|---------------------|------------|--------|----------------|--------|--------------------------------|------|---------------|--------------------------------|---------------------------------|-------|--------------|
| 41781821 | 342718       | 5COOPER2    | EKPC                | 324141     | 5ELIHU | LGEE           | 1      | EKPC_P2-<br>2_LAUREL<br>CO 161 | bus  | 277.0         | 108.45                         | 111.3                           | AC    | 7.69         |

| Bus #       | Bus          | Gendeliv MW Impact | Туре          | Full MW Impact |
|-------------|--------------|--------------------|---------------|----------------|
| 342900      | 1COOPER1 G   | 11.4249            | 50/50         | 11.4249        |
| 342903      | 1COOPER2 G   | 22.2261            | 50/50         | 22.2261        |
| 342945      | 1LAUREL 1G   | 6.9148             | 50/50         | 6.9148         |
| 939131      | AE1-143 C    | 10.1012            | 50/50         | 10.1012        |
| 939132      | AE1-143 E    | 5.0034             | 50/50         | 5.0034         |
| 940041      | AE1-246 C O1 | 9.1151             | 50/50         | 9.1151         |
| 940042      | AE1-246 E O1 | 4.4389             | 50/50         | 4.4389         |
| 940831      | AE2-071 C    | 2.5805             | 50/50         | 2.5805         |
| 940832      | AE2-071 E    | 1.7203             | 50/50         | 1.7203         |
| 943701      | AF1-038 C    | 6.7007             | 50/50         | 6.7007         |
| 943702      | AF1-038 E    | 4.4671             | 50/50         | 4.4671         |
| 943821      | AF1-050 C    | 4.5587             | 50/50         | 4.5587         |
| 943822      | AF1-050 E    | 3.0391             | 50/50         | 3.0391         |
| 944151      | AF1-083 C O1 | 4.6160             | 50/50         | 4.6160         |
| 944152      | AF1-083 E O1 | 3.0774             | 50/50         | 3.0774         |
| 944511      | AF1-116 C    | 11.3285            | 50/50         | 11.3285        |
| 944512      | AF1-116 E    | 7.5523             | 50/50         | 7.5523         |
| 945381      | AF1-203 C    | 1.4746             | 50/50         | 1.4746         |
| 945382      | AF1-203 E    | 0.9830             | 50/50         | 0.9830         |
| WEC         | WEC          | 0.0740             | Confirmed LTF | 0.0740         |
| CPLE        | CPLE         | 0.0939             | Confirmed LTF | 0.0939         |
| LGE-0012019 | LGE-0012019  | 7.9596             | LTF           | 7.9596         |
| CBM-W2      | CBM-W2       | 6.6667             | Confirmed LTF | 6.6667         |
| NY          | NY           | 0.0874             | Confirmed LTF | 0.0874         |
| TVA         | TVA          | 2.1266             | Confirmed LTF | 2.1266         |
| O-066       | O-066        | 1.0282             | Confirmed LTF | 1.0282         |
| CBM-S2      | CBM-S2       | 1.5375             | Confirmed LTF | 1.5375         |
| CBM-S1      | CBM-S1       | 10.3348            | Confirmed LTF | 10.3348        |
| G-007       | G-007        | 0.1591             | Confirmed LTF | 0.1591         |
| MADISON     | MADISON      | 1.5886             | Confirmed LTF | 1.5886         |
| MEC         | MEC          | 0.7913             | Confirmed LTF | 0.7913         |
| CBM-W1      | CBM-W1       | 2.5771             | Confirmed LTF | 2.5771         |

### **10.8 Queue Dependencies**

The Queue Projects below are listed in one or more indices for the overloads identified in your report. These projects contribute to the loading of the overloaded facilities identified in your report. The percent overload of a facility and cost allocation you may have towards a particular reinforcement could vary depending on the action of these earlier projects. The status of each project at the time of the analysis is presented in the table. This list may change as earlier projects withdraw or modify their requests.

| Queue Number | Project Name                         | Status |
|--------------|--------------------------------------|--------|
| AE1-143      | Marion County 161 kV                 | Active |
| AE1-246      | Barren County-Summer Shade 161 kV    | Active |
| AE2-071      | Patton Rd-Summer Shade 69 kV         | Active |
| AF1-038      | Sewellton Jct-Webbs Crossroads 69 kV | Active |
| AF1-050      | Summer Shade - Green County 161 kV   | Active |
| AF1-083      | Green County-Saloma 161 kV           | Active |
| AF1-116      | Marion County 161 kV                 | Active |
| AF1-203      | Patton Rd-Summer Shade 69 kV         | Active |

# **10.9 Contingency Descriptions**

| Contingency Name         | Contingency Definition   |   |
|--------------------------|--|---|
| EKPC_P2-3_MAR W38-1014   | CONTINGENCY 'EKPC_P2-3_MAR W38-1014'<br>OPEN BRANCH FROM BUS 324280 TO BUS 342769 CKT 1<br>138.00 342769 5MARION CO 161.00<br>OPEN BRANCH FROM BUS 342703 TO BUS 342769 CKT 1<br>161.00 342769 5MARION CO 161.00<br>OPEN BRANCH FROM BUS 341269 TO BUS 342703 CKT 1<br>69.000 342703 5CASEY CO 161.00<br>OPEN BRANCH FROM BUS 342703 TO BUS 342760 CKT 1<br>161.00 342760 5LIBERTY J 161.00<br>END | /* MARION CO<br>/* 324280 4MARIONL<br>/* 342703 5CASEY CO<br>/* 341269 2CASEY CO<br>/* 342703 5CASEY CO |
| EKPC_P4-2_MAR W38-1014   | CONTINGENCY 'EKPC_P4-2_MAR W38-1014'<br>OPEN BRANCH FROM BUS 324280 TO BUS 342769 CKT 1<br>138.00 342769 5MARION CO 161.00<br>OPEN BRANCH FROM BUS 342703 TO BUS 342769 CKT 1<br>161.00 342769 5MARION CO 161.00<br>OPEN BRANCH FROM BUS 341269 TO BUS 342703 CKT 1<br>69.000 342703 5CASEY CO 161.00<br>OPEN BRANCH FROM BUS 342703 TO BUS 342760 CKT 1<br>161.00 342760 5LIBERTY J 161.00<br>END | /* MARION CO<br>/* 324280 4MARIONL<br>/* 342703 5CASEY CO<br>/* 341269 2CASEY CO<br>/* 342703 5CASEY CO |
| EKPC_P1-2_LAUR-L DAM161  | CONTINGENCY 'EKPC_P1-2_LAUR-L DAM161'<br>OPEN BRANCH FROM BUS 342754 TO BUS 342757 CKT 1<br>161.00 342757 5LAUREL DAM 161.00<br>END  | /* LAUREL CO - LAUREL DAM<br>/* 342754 5LAUREL CO   |
| EKPC_P2-2_LAUREL CO 161  | CONTINGENCY 'EKPC_P2-2_LAUREL CO 161'<br>OPEN BUS 342754 /* 5LAUREL C<br>END   | /* LAUREL 161 BUS<br>CO   |
| EKPC_P1-2_COOP-ELIHU161  | CONTINGENCY 'EKPC_P1-2_COOP-ELIHU161'<br>OPEN BRANCH FROM BUS 324141 TO BUS 342718 CKT 1<br>342718 5COOPER2 161.00<br>END  | /* COOPER - KU ELIHU<br>/* 324141 5ELIHU 161.00   |
| EKPC_P7-1_COOP 161 DBL 2 | CONTINGENCY 'EKPC_P7-1_COOP 161 DBL 2'<br>COOPER - LAUREL DAM 161<br>OPEN BRANCH FROM BUS 324141 TO BUS 342718 CKT 1<br>342718 5COOPER2 161.00<br>OPEN BRANCH FROM BUS 342718 TO BUS 342757 CKT 1<br>161.00 342757 5LAUREL DAM 161.00<br>END   | /* COOPER - ELIHU 161 &<br>/* 324141 5ELIHU 161.00<br>/* 342718 5COOPER2                                |

| Contingency Name         | Contingency Definition  |
|--------------------------|---|
| EKPC_P7-1_LAURL 161 DBL  | CONTINGENCY 'EKPC_P7-1_LAURL 161 DBL' /* LAUREL CO - LAUREL DAM 161<br>& LAUREL CO - TYNER 161<br>OPEN BRANCH FROM BUS 342754 TO BUS 342757 CKT 1 /* 342754 5LAUREL CO<br>161.00 342757 5LAUREL DAM 161.00<br>OPEN BRANCH FROM BUS 342754 TO BUS 342781 CKT 1 /* 342754 5LAUREL CO<br>161.00 342781 5PITTSBURG 161.00<br>OPEN BRANCH FROM BUS 342781 TO BUS 342820 CKT 1 /* 342781 5PITTSBURG<br>161.00 342820 5TYNER 161.00<br>END |
| EKPC_P4-5_LAURL          | CONTINGENCY 'EKPC_P4-5_LAURL S50-1014' /* LAUREL CO<br>OPEN BUS 342754 /* 5LAUREL CO DROPS BUS<br>END   |
| Base Case                |   |
| EKPC_P4-5_LAURL S50-1024 | CONTINGENCY 'EKPC_P4-5_LAURL S50-1024' /* LAUREL CO<br>OPEN BUS 342754 /* 5LAUREL CO DROPS BUS<br>OPEN BRANCH FROM BUS 324688 TO BUS 342781 CKT 1 /* 324688 2PITTSKU 69.000<br>342781 5PITTSBURG 161.00<br>OPEN BRANCH FROM BUS 342781 TO BUS 342820 CKT 1 /* 342781 5PITTSBURG<br>161.00 342820 5TYNER 161.00<br>END   |

# **11 Light Load Analysis**

The Queue Project AF1-083 was evaluated as a 26.0 MW injection/withdrawal (battery) tapping the Green County to Saloma 161 kV line (specifically the Taylor County Jct – Saloma Tap 161 kV line segment) in the EKPC area. Project AF1-083 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-083 was studied with a commercial probability of 100.0 %. Potential network impacts were as follows:

### **11.1 Generation Deliverability**

(Single or N-1 contingencies)

None

# **11.2 Multiple Facility Contingency**

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies)

None

# **11.3 Contribution to Previously Identified Overloads**

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

# **11.4 Steady-State Voltage Requirements**

None

# **11.5** Potential Congestion due to Local Energy Deliverability

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

None

# **11.6 System Reinforcements**

None

# **12 Short Circuit Analysis**

The following Breakers are overdutied

None

# 13 Stability and Reactive Power Requirements for Low Voltage Ride Through

(Summary of the VAR requirements based upon the results of the dynamic studies)

To be evaluated during the Facilities Study Phase

# **14 Affected Systems**

### 14.1 TVA

TVA Impacts to be determined during later study phases (as applicable).

### 14.2 Duke Energy Progress

Duke Energy Progress Impacts to be determined during later study phases (as applicable).

### 14.3 MISO

MISO Impacts to be determined during later study phases (as applicable).

### 14.4 LG&E

An LG&E Affected System Study will be required. PJM has identified several EKPC-LG&E tie line overloads with limiting equipment on the LG&E side. LG&E will need to determine if LG&E upgrades are required.

# 15 Attachment 1: One- Line Diagram

Green County 161 kV

Saloma 161 kV



Attachment N Economic Report

### Paul A. Coomes, Ph.D.

Consulting Economist 3604 Trail Ridge Road Louisville KY 40241 502.608.4797 coomes.economics@gmail.com Emeritus Professor of Economics, University of Louisville

March 18, 2021

TO: Carson Harkrader Flat Run Solar, LLC 400 W. Main St, Suite 503 Durham, NC 27701 www.carolinasolarenergy.com

FROM: Paul Coomes

RE: Economic and fiscal impact of the Flat Run solar energy project

This note provides estimates of the new economic and fiscal activity expected from the proposed Flat Run solar energy project just northwest of Campbellsville, in Taylor County, Kentucky. Flat Run Solar, LLC is developing the 450 acre site, which will have an electricity generation capacity of 55 megawatts. The company anticipates an investment of approximately \$90-\$120 million. The company and the County government are negotiating a financial agreement in which, if agreed and signed, the company will make annual payments in lieu of taxes (PILOT) to local government jurisdictions. The project is described on the company's website<sup>1</sup>.

There are two primary impacts expected from the project. First, there will be a one-time spike in construction and linked jobs as the site is constructed over approximately one year. Second, there will be four decades of new tax (PILOT) payments to local jurisdictions in Taylor County due to the increased value of real estate and the new tangible property installed at the site. Using company estimates of construction jobs and payroll, I estimate that there will be a total of 199 new jobs in the County in year one, with new payroll of \$9.89 million. And, the PILOT agreement will result in \$1.32 million in payments to County jurisdictions over the next forty years.

<sup>&</sup>lt;sup>1</sup> See: <u>www.carolinasolarenergy.com/projects-in-development-source/flat-run</u>

# The site

The site is approximately five miles northwest of the County seat in Campbellsville and is currently in agricultural and sparse residential use. One can see in the Google Earth view below the farmland, homes, and Hobson Road (Highway 744).



# **Construction phase**

The company expects to invest over \$90 million in the solar project. The investment involves land acquisition, site preparation, solar panel and electrical equipment installation, plus landscaping and security fencing. ENGIE North America, likely to be the owner of the project, will hire a construction company for this project, and estimates that that it will require up to 150 workers over 8-12 months, with a payroll of \$7.5 million. It is not possible to know precisely the ultimate number of construction-related jobs, since many subcontractors will be involved, each with their own decisions to make about staffing. The subcontractors, for example, may choose to use fewer highly skilled workers or more less-skilled workers, depending on local labor market conditions. I use the ENGIE estimate, as they have global experience with solar farm developments. Their estimates imply an average annual pay of \$50,000 per construction job.

Occupations include construction managers, earth grader operators, panel installers, electricians, and fencers. I searched the federal database on hundreds of occupations to learn how much these workers are likely to earn on the project. There is no listing in the Kentucky data for "Solar Photovoltaic Installer", but the national average annual wage is \$46,850<sup>2</sup>. Good inferences about other relevant occupations can be gleaned from the next table. The construction managers are likely to earn over \$80,000, heavy equipment operators around \$50,000, installers around \$45,000, electricians around \$53,000, and fencers \$30,000. These data suggest that the \$50,000 average pay assumed for construction jobs is reasonable. The average annual pay for all jobs in Green County in 2018 was \$30,427.

| \nnual mean<br>wage |
|---------------------|
|                     |
| \$83,570            |
| \$51,410            |
| \$53,440            |
| \$30,090            |
| \$80,480            |
| \$79,790            |
| \$82,300            |
| \$42,780            |
| \$62,300            |
| \$47,740            |
|                     |

Source: US Bureau of Labor Statistics, Occupational Employment Survey, https://data.bls.gov/oes/#/home

# Spin-off impacts

The construction phase will have some spin-off effects in Taylor County. I model this using a custom IMPLAN model of the County<sup>3</sup>. The relevant sector for the construction phase is number 52, "Construction of new power and communication structures", and this can be used to model the initial investment. The likely owner expects construction to last approximately one year and to support up to 150 jobs in the County, with a payroll of \$7.5 million. This is the direct effect.

The model has detailed information about the inter-industry linkages in each regional economy, as well as the expected household spending on retail goods and services due

<sup>&</sup>lt;sup>2</sup> See <u>www.bls.gov/ooh/construction-and-extraction/solar-photovoltaic-installers.htm#tab-1</u>, with details in the lookup database <u>https://data.bls.gov/oes/#/home</u>, Standard Occupational Code #472231 as of May 2019.

<sup>&</sup>lt;sup>3</sup> For documentation of IMPLAN modeling, see <u>www.implan.com/history/</u>.

to the enhanced employee compensation. When there is new industrial activity in a region, the model can predict how much of the supply chain can be met by local businesses and how much the new payroll will result in additional sales by local businesses. Adding these two effects to the direct effect yields the total effect of a development, and dividing the total effect by the direct effect yields a multiplier. Using the Taylor County multipliers for the relevant construction sector, and the assumed direct construction budget, I project there will be a total of 199 new jobs in the County, and new payroll of \$9.89 million.

The will also be some modest spin-off impacts from ongoing operations. The company expects operations to support only two or three jobs. Unfortunately, for the operations phase, the relevant IMPLAN sector, number 42, "Electric Power Generation – Solar", is empty of data and results for Taylor County. This is because there is no history of solar electricity generation and therefore no basic economic data to construct industry relationships. A reasonable recourse is to tap the literature on solar project impacts, find comparable places, and use other studies to estimate the likely operational impacts on local economies in Kentucky. For example, the Shugart solar farm in Maryland was studied extensively, and analysts projected that annual operations will support a total of only four jobs in the County (including modest spinoff activity)<sup>4</sup>. Thus, ongoing annual economic impacts are expected to be very small relative to the one-time impacts of construction.

# Local tax revenues, IRB, PILOT agreement

Taylor County levies property taxes on real estate and tangible property. The table below provides the latest tax rates that are applied County-wide. They total about one percent of the assessed value of property. The only other taxing jurisdiction in the County is the City of Campbellsville, but the Flat Run project is outside the City boundary and thus would not subject to those property taxes. Also, because the project is outside the City, the payroll from construction jobs and any net profits from ongoing operations will not be subject to the City's occupational license fee and net profits tax, both with a rate of one percent.

<sup>&</sup>lt;sup>4</sup> See pages 13-14 of the July 31, 2019 study of the Shugart, Maryland project: <u>https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Documents/Solar/Shugart-Solar-Socio-Economic-Justification-Report-FINAL.pdf</u>

| Taylor County Proper       | rty Tax Rates | , 2019   |
|----------------------------|---------------|----------|
| in cents per \$1           | 00 valuation  |          |
|                            |               | Tangible |
| Jurisdiction               | Real Estate   | Personal |
| Extension Services         | 4.3960        | 6.4096   |
| Fiscal Court - General     | 8.2000        | 9.5000   |
| Health Department          | 3.2500        | 3.2500   |
| Hospital                   | 8.3000        | 9.1000   |
| Library                    | 7.8000        | 11.4700  |
| County Public Schools      | 61.2000       | 61.2000  |
| Total, County-wide         | 93.1460       | 100.9296 |
| Source: Kentucky Departmer | nt of Revenue |          |

The County and the company are negotiating an Industrial Revenue Bond (IRB) and a Payment in Lieu of Taxes (PILOT) agreement, whereby the company makes annual payments to the County jurisdictions. The draft agreement calls for payments of \$1,000 per megawatt of stated capacity for twenty years, then \$200 per MW for the next twenty years. With a capacity of 55MW, this implies the company will pay \$1.32 million to the County over the next forty years. It should be pointed out that solar projects like this require almost no public services from local government; and because they require so few people to operate do not add students and expenses to the local public school system. Attachment O Site Assessment Report \*Site Assessment Report Contained in Volume 2 of the application

# Attachment P Flat Run Solar, LLC Certificate of Authority

| Prevent is the proclama of KRS 14A and KRS 271B. 273. 2247S. 3872 and 386 for authority = fee Receipt Section (RRS 271)       Implementation (RRS 271)         1. The entity is a :       profit comparison (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         1. The entity is a :       profit comparison (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         2. The number of the entity is the RRS 371B. Comparison (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         3. The number of the entity is the RRS 371B. Comparison (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         3. The number of the entity is the RRS 371B. Comparison (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         3. The number of the entity is the resolution is account of a start on comparison (RRS 271B)       Implementation is account of a start on comparison (RRS 271B)         4. The number of the entity's proclamation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         5. The number of the entity's proclamation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         6. The number of the entity's proclamation (RRS 271B)       Implementation (RRS 271B)       Implementation (RRS 271B)         7. The strates of the entity's p   | Provided in the procedures of (NES 2718, 272, 272, 272, 272, 272, 272, 272, 27  | Division of Business Filings<br>P.O. Box 715<br>Frankfort, KY 40602<br>(502) 564-3490<br>www.soil.by.gov  | Certificate of Autho<br>(Foreign Business Entity   | rity   |   | <b>110292</b><br>Michael G. A<br>Kentucky Se<br>Received an<br>7/7/2020 10: | 9.06<br>Adams<br>ecretary of Si<br>Ind Filed:<br>102 AM | Bden<br>Al<br>tate |
|---|---|---|--|--|---|---|---|--------------------|
| 4. The state or country under whole site is a grint is a regardized it. Morfl. Carolina   | A. The state or country under whose sets the settly is argundated is. Morth Carginal       get af term of the settly principal office is         B. The data or country under whose sets the settly principal office is       Durinam       No       Z7761         Core       Durinam       No       Z7761         Core       Durinam       No       Z7761         Core       Durinam       No       Z7761         State of bits of the settly's registered office is during the settly is registered of the settly's registered of the settly  | Pursuent to the provisions of KRS 14A<br>on bohalf of the entity samed below and<br>1. The entity is a : D profit corpor<br>business tru<br>Emited parts<br>non-profit is<br>2. The name of the entity is Fiat Run<br>(The na<br>3. The same of the entity to be used in                              | and KRS 2718, 273, 274, 275, 362 and<br>1. for that purpose, submits the following<br>et(RRS 386).<br>(KRS 3 | Id 385 the undersigned hereby (<br>ing statements:<br>corporation (KRS 273)<br>IBy company (KRS 275)<br>IBy company (KRS 275)<br>IBy company (KRS)<br>IB | apies for authority<br>professional servi<br>professional fimile<br>statutory rust<br>unincorporated au | Fee Receipt<br>ce corporation (10<br>Mability company<br>sociation          | : \$90.00<br>R5 274)<br>y (KR5 275)                     |                    |
| 333 W. Wre Street, Subs 1500       Lexington       KY       40507         Break Address the Numbers       City       Rate       200 Code         and the name of the registered agent at that office is Jernes W. Gardner       Rate       200 Code         8. The names and business addresses of the arith/'s representatives (secretary, officers and directors, managers, fursitest or general partners):       Chieven Harlmunder       NC       27701         Rease       Bores of P.O. Bori       Durham       NC       27701         Name       Bores of P.O. Bori       City       Rate       21p Code         Name       Bores of P.O. Bori       City       Rate       21p Code         Name       Bores of P.O. Bori       City       Rate       21p Code         Name       Bores of P.O. Bori       City       Rate       21p Code         Name       Bores of P.O. Bori       City       Rate       21p Code         Name       Bores of P.O. Bori       City       Rate       21p Code         Name       Bores of P.O. Bori       City       Rate       21p Code         10. I certify thig, so Cite act of fing (the above-rank act and the adopted of the application.       21p Code       21p Code         11. If a indicating theability indinder patinership.       Check the bor of api   | Size V., Vine Stead, Subs 1500       Lydrigton       IV       40007         Bares data with PA. Bars       Size protected with PA. Bars       Size of protected with PA. Bars       Size of protected with PA. Bars         Crigorian       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None atoms of the registrated with PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Size of protected with PA. Bars         None       Bores of PA. Bars       Chy       Bars       Directed With PA. Bars         None       Bores of PA. Bars       Chy       Bars       Directed With P  | The state of country under whose is     S. The date of organization is <u>8/21/2(</u> G. The midling address of the entry's p     400 W, Main Street     Bitrest Address     7. The street address of the entry's re;   | w the entity is organized is <u>North Ca</u><br>119<br>Incipal office is<br>Island office in Kontucky is   | rolina<br>_and the period of duration is<br>to a<br>Durinam<br>City  | NC<br>State   | 27701<br>Zip Cede   |   |                    |
| Rase     Street or P.O. Bari     City     Rate     Zip Code       Harne     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     City     State     Zip Code       Name     Street or P.O. Bari     Street or P.O. State     Zip Code     Street or P.O. State       Name     Street or P.O. State     Street or P.O. State     Street or State     Street or State       Name     Street State     Street State     Street State     Street State       Name     Street State     Street State     Street   | Research     Street or P.C. Ber     City     Rule     Zip Gold       Name     Street or P.C. Ber     City     Rule     Zip Gold       B. 3 generative among the street of P.C. Ber     City     Rule     Zip Gold       B. 4 generative among the street of P.C. Ber     City     Rule     Zip Gold       B. 4 generative among the street of P.C. Ber     City     Rule     Zip Gold       B. 4 generative among the street of P.C. Ber     City     Rule     Zip Gold       To. Contry that, as of the data of Bing the street of the street  | 333 W. Vine Street, Sulle 1500<br>Breat Address (He P.O. Bex Humbers)<br>and the name of the registered agent at<br>8. The names and business addresses<br>Carson Harbrader   | that office is James W. Gardner<br>of the antity's representatives (secret<br>400 W. Main Street   | Lexington<br>City<br>ary, officers and directors, mana<br>Durham   | KY<br>Sinte<br>Igers, trustees or ge<br>NC  | 40507<br>Zip Code<br>herst pariners):<br>27701                              |   |                    |
| The application of the Users back of Disk of Convex a processing series and accident of papers of the adjustication.       10. / contry this, so of the class of Bind Bisbilly Binked partnership.       Check the laws of the purchase of the adjustication.         10. / contry this, so of the class of Bind Bisbilly Binked partnership.       Check the back of the purchase of the adjustication.         11. If a Binded pertnership.       Excitation the adjustication.       If the application.         12. If a Binded pertnership.       Excitation the box of applicable:       If the applicable.         13. This application will be effective class cannot be prior to the date the application is filed.       The class and/or time is provided.         The adjusted the Restandy conversel.       Plasse ballowing, plasse shole the New completely.       The class and/or time is provided.         13. This application will be effective class connot be prior to the date the application is filed.       The class and/or time is provided.         14. The class ballowing the Restandy converts       Plasse ballowing, plasse shole the bar completely.       The class and/or time is plasse indicate which of the fallowing.         15. The application will be effective class convert       Plasse ballowing the shore of your business annamble:       Plasse ballowing the shore of your business annamble:         16. Convert       The class of the fallowing best describer your business:       Plasse fallowing, plasse shore of your business annamble:       Plasse fallowing, plasse shole the fallowing best describer your busine | The prime area below to the set of lifes of the set of prime is prime and in the set of the set of the prime is a data of the set of t | Manne<br>Manne<br>Nente   | Street or P.O. Box<br>Pirest or P.O. Box<br>Street or P.O. Box   | City<br>City<br>City   | State<br>State<br>State   | 2/p Code<br>Zip Code<br>Zip Code  |   |                    |
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| Places indicate which of the following best describes your business:         Digriculture       Unifing         Misolesale Trade       Description         Public Administration       Discuss Trade         Discuss Trade       Discuss Trade         Public Administration       Discuss Trade         With Discuss Trade       Discuss Trade         Carson Harkrader, CEO       6/30/2000         Standards       Censon Harkrader, CEO         Mission Barray       Conson Harkrader, CEO         Mission Barray       Discuss Trade         Printed Name & This       Date         Improve of Administration       Conson Harkrader, CEO         Standards       Conson Harkrader, CEO         James W. Gartiner       Conson Harkrader, CEO         Attorney       The Dusiness entity.         Year Standards       Date         Standards       Date         Times W. Gartiner       Attorney         Standards       Printed Nesse         Standards       Printed Nese   | Hesses indicate which of the fullowing best describer your business:  | Plasse indicate the size of your husbrass<br>Small (fewar than 50 employees)<br>Darge (50 or more employees)  | To complete the following,<br>Plasse indicate whether an<br>Woman-Owned  | alexan shade the bar completely.<br>y of the following make up more t<br>Veteran Gwned Dulinorhy C   | thần fiếty percent (501<br>Imped  | 6) of your business   | gumarahla:  |                    |
| Carson Harkrader, CEO     6/30/20 20       Standard Manager     Printed Manager       Automate of Authoritand Representations     Printed Manager       Automate W. Genthier     Consent to serve as the registered agent on behalf of the business entity.       Year New W. Genthier     James W. Genthier       With W. (GHAM)     James W. Genthier       Signification of Registered Agent     Printed Manager       Signification of Registered Agent     The   | Carson Harkrader, CEO     6/9/2020       Standard     Printed Name & This       1, Jannes W. Gardiner     Consent to serve as the registered spark on behalf of the business entity.       Variable Name of Registered Agent     Jannes W. Gardiner       Attorney     7/1/2000       Standard Registered Agent     Printed Name       Table     1000000000000000000000000000000000000  | Places indicate which of the following to:<br>Agriculture Children Missiessie Trade Distant Duble Administration Citrans Cother   | st describes your business:<br>i Kondees<br>Trade Detendescuring<br>soriation, Communications, Electric, Gas,  | Construction<br>Drinence, Instarance, Rea<br>Sanitary Services   | il Gatate   | 10 - 1 -  |   | ·                  |
|   | (1720)  | Mr. Day<br>Summer of Audionized Representative<br>1. James W. Gertiner<br>Sandhes Rossof Representative<br>Confidence Rossof W. M. (2010)<br>Sumpling of Registered Agent   | Cars   | on Harkrader, CEO<br>Printed Name & Title<br>trend to serve as the registered<br>diner Altorne<br>Title  | agent on behalf of U  | 130720<br>1 Data<br>1 Data<br>1 Data<br>1 Data<br>17/1<br>Data              | 10000   |                    |

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