

Request No. 1:

Refer to Telesto's response to Siting Board Staff's First Request for Information (Response to Staff's First Request), Item 32.

- a. Confirm that county level data is available with which to run the JEDI model.
- b. If similar projects in Ohio have estimated creation of at least 150 jobs at the county level during construction, explain why Telesto chose not to run the JEDI model at the county level and, instead use the less accurate scaling method to estimate local economic impacts.

Response No. 1:

a. The JEDI model does not use county input. As described in Section 3 (Methodology) economic estimates for Hardin County, Kentucky, are estimated by scaling down Kentucky impacts by a factor determined by the relative GDP of Hardin County to the GDP of Kentucky. For operational phase impacts in particular, this scaling methodology is likely to yield an estimate that under-predicts actual economic impacts. This is an arithmetic result from the JEDI model and based on Hardin County's GDP and number of jobs compared to the state. JEDI is not able to natively run at the county level. County level results are estimated from a scaling approach based on state level estimates. Therefore, the JEDI model does not provide economic impacts results for Hardin County beyond those found in the existing analysis.

b. Telesto used a JEDI model. Telesto placed greater emphasis on the state level results, as county level estimates are associated with much higher levels of uncertainty. Telesto's approach to county level estimates acknowledges uncertainty and takes a conservative approach (meaning it is highly likely to underestimate impacts relative to actual impacts). That said, many Ohio Solar cases only run at the state level as Ohio's state siting board does not require county level runs. Also, both IMPLAN and JEDI estimates of economic impacts are highly geographically

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dependent. Therefore, it is possible that some counties (especially those with large and underutilized labor forces in related industries) have materially higher estimates than other counties. It is Telesto's intention to use as many local resources as practical; this number is expected to be closer to 30% of jobs being filled by local persons.

Responding Witness: Chad Martin

Request No. 2:

Refer to the Application, Exhibit B.2.e, page 2, the information sheet provided to local residents, and Exhibit M, page 5. Also, refer to the Response to Staff's First Request, Item 33 b.

- a. Exhibit B.2.e states, "150-200 direct jobs, during the approximately 10–12-month construction period, with the majority local workers." Telesto's application contains an estimated 335.9 direct construction jobs coming from Kentucky, but only 8.4 direct construction jobs as coming from Hardin County. Explain differing direct employment estimates.
- b. Explain whether Telesto informed attendees at any public or private meetings that it estimated that only 8.4 direct construction jobs would come from Hardin County.
- c. Assuming the statement in the public information sheet of a majority of the 150-200 jobs will be hired locally is correct, this means the indirect and induced economic impacts will also be much greater than Telesto's official estimates. Provide updated economic impact analysis supporting its public statement that a majority of the direct construction jobs will be hired locally.
- d. From previous project development experience, it would be reasonable to assume that the necessary types of construction skills, the total number of workers hired, and the number hired locally would be known with a reasonable degree of certainty. Explain both how the model obtained a result of 335.9 direct construction jobs for Kentucky and the origin of the 150-200 jobs advertised in public information documents.

Response No. 2:

- a. These figures are based on the model used by Telesto. Regardless of the model results, Telesto is committed to making efforts to hire as many local workers as practicable, given the local labor market and other local conditions.

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- b. Telesto accurately informed attendees that Telesto would make significant efforts to hire as many local workers as practicable.
- c. Telesto does not have alternative model results, and thus does not have updated economic impact analysis results. Regardless of the model results, Telesto intends to hire as many local workers as practicable.
- d. The 150-200 jobs are based on previous development experience and the likely high demand for construction workers in Hardin County over the next 12-48 months. Given the anticipated labor market in Hardin County, the exact number of local workers that will be available is difficult to estimate, but was conservatively estimated at 150-200 jobs, despite the 335.9 construction jobs predicted by the model. The remaining construction jobs will be filled with individuals hired from outside Hardin County.

Responding Witness: Jack Steele

Request No. 3:

Refer to the Response to Staff's First Request, Item 42.

- a. If pile driving activity produces sound levels that are greater than Environmental Protection Agency (EPA) daytime standards at the sensitive noise receptor, explain why pile driving intermittency is relevant.
- b. Explain whether Telesto intends to use multiple pile drivers in close proximity such that the sound levels produced would be magnified beyond what would be produced by a single pile driver and, if so, explain what those sound levels would be.
- c. In instances where pile driving activity will cause significant noise pollution, explain what additional mitigation measures will be used.
- d. In instances where pile driving or other construction noise, is greater than EPA daytime standards at sensitive noise receptor locations, confirm that the only effective sound mitigation measures Telesto proposes are "significant buffers and vegetation zones."

Response No. 3:

- a. The EPA-sourced document used to base these statements provides: the 24-hour exposure level of 70 decibels as the level of environmental noise which will prevent any measurable hearing loss over a lifetime. Likewise, levels of 55 decibels outdoors and 45 decibels indoors are identified as preventing activity interference and annoyance. These levels of noise are considered those that will permit spoken conversation and other activities such as sleeping, working and recreation, which are part of the daily human condition. The majority of non-participating receptors are outside of the 55dBA contour; Those within the contour would experience sound levels from pile driving closer to 64dBA, intermittently as crews work from one pole to the next. Installation crews would be working laterally and therefore the receptor would eventually be outside of the 55dBA contour for

the remainder of the project. Further, the pile driving activities would only take place during an 8-hour window from 8am to 6pm. These sound levels do not take into account that sensitive receptors would potentially be indoors, decreasing overall sound values.

b. The engineering, procurement and construction contractor may use multiple pile drivers in the vicinity of one another. Cardno modeled noise from three pile drivers in close vicinity to each other and only found a 2dBA increase at a modeled receptor within the 55dBA contour.

c. Noise impacts above 55dBA at any one receptor are not expected for more than 3-5 days during the daylight working hours. Telesto does not propose installing noise mitigation measures for this brief period of time.

d. Telesto believes that existing tree lines and riparian vegetation will adequately mitigate overall daytime noise levels during short term pile driving activities to nearby receptors.

Responding Witness: Chad Martin

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Request No. 4:

Refer to the Response to Staff's First Request, Item 43. Confirm that during the construction period, no sensitive noise receptor within 1,500 feet of construction noise producing activity will experience construction noise levels in excess of 55 decibels. If it cannot be confirmed, explain what measures Telesto will employ to mitigate the noise down to the level of at least 55 decibels.

Response No. 4:

It is likely that some receptors may experience periodic and temporary noise levels above 55dBA. These levels of noise would be similar to seasonal agricultural activity (tractors/plowing) within fields or from new home construction activities currently adjacent to identified receptors. No further mitigation is proposed.

Responding Witness: Chad Martin

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Request No. 5:

Refer to the Response to Staff's First Request, Item 28. Provide an update on whether any discussions have occurred with the city of Elizabethtown and the Energy and Environment Cabinet's Division of Oil and Gas regarding the gas storage field. If there still has not been a consultation, provide details on when that consultation will occur.

Response No. 5:

Discussions have been held with Ed Poppe from the City of Elizabethtown.

Responding Witness: Jack Steele

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Request No. 6:

Refer to the Response to Staff's First Request, Item 29. Provide an update to any contact with representatives at Energy Transfer Partners regarding the crude oil pipeline within the project boundaries.

Response No. 6:

Telesto made contact with representatives at Energy Transfer Partners. Telesto is now aware of all requirements necessary to facilitate Energy Transfer's review of the proposed pipeline crossing locations and will be filing all associated documentation.

Responding Witness: Jack Steele

Request No. 7:

Refer to the Response to Staff's First Request, Items 18, 19, 20, and 21 and the 10 percent Design Layout Plan (filed August 23, 2022).

- a. Provide the location where each medium voltage (MV) line goes underground within the project boundary.
- b. Confirm the transmission line from the project substation to the East Kentucky Power Corporation substation will be underground.
- c. Provide a copy of the lease or purchase agreement for the land the project substation will be located on.
- d. Provide any right of way agreements for the nonregulated transmission line.
- e. Provide an approximate date the application for the nonregulated transmission line will be filed.

Response No. 7:

- a. MV cables are only above ground at inverter locations, where they leave the inverter boxes, and go straight underground. See Sound Study (Application Exhibit H) for inverter locations.
- b. As the exact location of the substation has not been confirmed, the transmission line details cannot be confirmed at this time.
- c. Currently, no lease or purchase agreement exists for the land where the substation has been proposed to be located. Telesto is in negotiations with the property owner regarding the exact location of the substation, but the current owner is in the process of developing the property. As the property owner's development progresses, Telesto will continue to negotiate with the owner regarding the exact location that the substation will

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be sited. Once an exact location has been determined by the property owner and Telesto, a lease will be executed and provided to the Board. Telesto anticipates executing such a lease in the next 30-45 days.

d. See responses to 7(b) and 7(c).

e. Telesto anticipates filing an application for the nonregulated transmission line within weeks of finalizing the lease agreement securing an exact location of the substation.

Responding Witness: Jack Steele

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Request No. 8:

Refer to the Response to Staff's First Request, Item 17. The Project is located within two electric service areas, Kentucky Utilities and Nolin Rural Electric Cooperative Corporation. Provide which service territory the proposed Operation & Maintenance Building is located.

Response No. 8:

Telesto has not yet determined what electric provider will provide station power for the Operation & Maintenance building.

Responding Witness: Jack Steele

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Request No. 9:

During the Site Visit, representatives from Telesto indicated there has been a reduction in the number of site entrances. Provide a simplified map that clearly delineates the location of the revised access points and the public roads from which Telesto plans to access the project site during construction and operations. Show the name of the relevant public roads. Do not provide the anticipated locations of solar equipment within project, just the roads that will be utilized.

Response No. 9:





See attached.

Responding Witness: Jack Steele

Telesto - Site Entrance Locations

Telesto Solar
Hardin County, KY
Date: 9/30/2022

Legend

-  Project Boundary
-  Site Entrances
-  Access Roads
-  Public Roads

