

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

In the Matter of:

|                                          |   |                     |
|------------------------------------------|---|---------------------|
| ELECTRONIC APPLICATION OF FRON BN, LLC   | ) |                     |
| (FRONTIER SOLAR) FOR A CERTIFICATE OF    | ) |                     |
| CONSTRUCTION FOR AN APPROXIMATELY 120    | ) |                     |
| MEGAWATT MERCHANT SOLAR ELECTRIC         | ) |                     |
| GENERATING FACILITY AND NONREGULATED     | ) | Case No. 2023-00360 |
| ELECTRIC TRANSMISSION LINE IN MARION AND | ) |                     |
| WASHINGTON COUNTIES, KENTUCKY            | ) |                     |
| PURSUANT TO KRS 278.700 AND 807 KAR      | ) |                     |
| 5:110                                    | ) |                     |

**NOTICE OF FILING**

Comes now FRON bn, LLC (“Applicant” or “Frontier”), by and through counsel, and hereby provides notice to the Kentucky State Board on Electric Generation and Transmission Siting (“Siting Board” or “Board”) of filing the final site plan in compliance with the final order issued by the Board on June 25, 2024 (“Construction Certificate”). In support thereof, the Applicant respectfully states as follows.

The Siting Board issued the Construction Certificate for Frontier’s generation facility and nonregulated electric transmission line (“Project”) subject to certain ordered mitigation. For the generation facility, the Board required the following mitigation measures:

1. A final site layout plan shall be submitted to the Siting Board upon completion of the final site design. Deviations from the preliminary site layout should be clearly indicated on the revised graphic. Those changes could include, but are not limited to, location of solar panels, inverters, transformers, substation, operation and maintenance building, transmission line route, or other Project facilities and infrastructure.
2. Any change in the Project boundaries from the information that formed this evaluation shall be submitted to the Siting Board for review.
3. The Siting Board will determine whether any deviation in the boundaries or site layout plan is likely to create a materially different pattern or magnitude of impacts.

For the nonregulated electric transmission line, the Board required the following mitigation measures:

35. Frontier Solar shall adhere to the proposed transmission route presented in the application. Should Frontier Solar find it necessary to include any parcel of land not included in this response in order to finalize the route of the proposed transmission line, Frontier Solar shall return to the Siting Board to request an amendment to the location of the transmission line.

36. In order to minimize the impacts provided for in KRS 278.714(3) Frontier Solar shall submit a final layout of the transmission line and make all reasonable efforts to minimize a new right of way and instead try to co-locate with current transmission facility.

Frontier filed a motion to amend its transmission line route pursuant to Mitigation Measure 35 on July 2, 2025,<sup>1</sup> which the Board granted on February 16, 2026. Exhibit A, enclosed herewith, is the final site layout plan for Frontier and will include depictions of both the generation facility and transmission components of the Project.

### **Deviations from Preliminary Site Layout**

The changes between the preliminary site layout plan and the final plan, as provided in Exhibit A, do not create a materially different pattern or magnitude of impacts and maintain compliance with all setbacks prescribed by the Board’s final order. The primary changes from the preliminary plan are depicted in Table 1 below.

**TABLE 1: Comparison Table, Preliminary and Final Site Plans**

| Component/Feature             | Preliminary Site Plan (June 2024) | Final Site Plan (March 2026) |
|-------------------------------|-----------------------------------|------------------------------|
| Number of central inverters   | 35                                | 33                           |
| Number of PV panels           | 266,274                           | 240,800                      |
| Linear feet of fence          | 76,461                            | 86,844                       |
| Access road entrances         | 6                                 | 4                            |
| Project Limits of Disturbance | 935 acres                         | 793 acres                    |

---

<sup>1</sup> Motion to Amend Transmission Line Route and Petition for Confidential Protection.

As shown in Table 1, the Project's final site layout will have 142 fewer acres than previously permitted. This reduction was due to removal of two parcels from the northeast portion of the Project site. Panel arrays have been relocated and optimized to preserve the Project's permitted generation capacity.

The Project will have approximately 10,383 feet of additional fencing in order to avoid crossing federally jurisdictional aquatic features and accommodate relocated panel arrays resulting from the reduction of the overall site. The Construction Certificate does not dictate a setback for the fence component of the facility and Project fencing will not cause material impacts to the surrounding community and environment.

The Project will have two fewer central inverters from the preliminary plan and will increase the distance between the nearest inverter and noise receptor by approximately 82 feet. As such, any noise impacts anticipated at the closest receptor to an inverter would be further reduced from this increased distance. This setback distance is compliant with those requested in Frontier's Amended Motion for Deviation from Setback Requirements and the minimum distances imposed by the Board in Mitigation Measure 18.

The Project will have approximately 25,474 fewer PV panels than previously approved by the Board. This change will reduce the overall impact of the Project and Frontier does not anticipate any changes to its generation capacity from their removal. The panel setback distance is compliant with that requested in Frontier's Amended Motion for Deviation from Setback Requirements and the minimum distances imposed by the Board in Mitigation Measure 18.

The Project's preliminary layout included six permanent access points, which have been reduced to four access points in the final site layout. The two access points associated with the northeastern parcels that were removed from the final site layout have likewise been removed. One

access point has been relocated to McClain Road in the western portion of the site. Remaining Project entrances, including the entrances providing access to the substation and transmission line, will stay in place as permitted. The reduction in access points will not result in increased traffic along anticipated delivery routes. All roads leading to the final access gates were included in the Project's Road Traffic Assessment, which have available capacity to accommodate traffic associated with the Project's construction and operations activities.

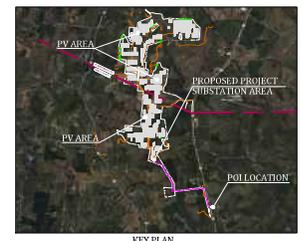
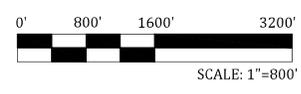
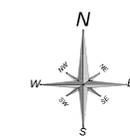
The Project has reduced the total number of transmission poles within its approved route from 31 to 29 poles. Design optimization and advancement led to a reduction in number of poles needed for the transmission line, and will have a correlating reduction in overall impacts from the Project.

WHEREFORE, FRON bn, LLC hereby provides notice of the final site plan and its compliance with the Board's June 25, 2024 final order, Appendix A, Mitigation Measures 1 and 36.

Respectfully submitted,

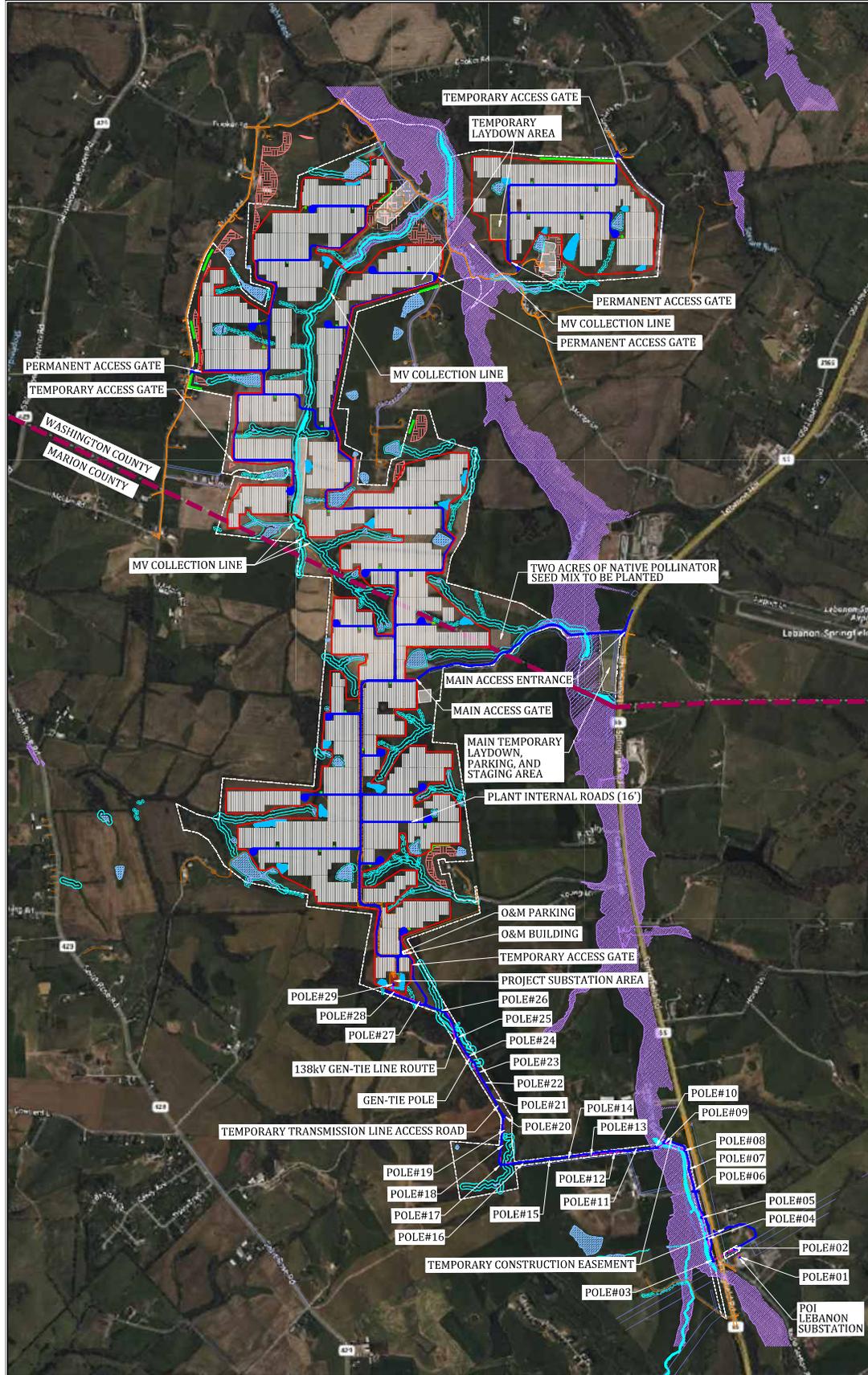
/s/Pierce T. Stevenson  
Gregory T. Dutton  
Pierce T. Stevenson  
**FBT GIBBONS LLP**  
400 West Market Street, Suite 3200  
Louisville KY 40202  
(502) 589-5400  
(502) 581-1087 (Fax)  
[gdutton@fbtgibbons.com](mailto:gdutton@fbtgibbons.com)  
[pstevenson@fbtgibbons.com](mailto:pstevenson@fbtgibbons.com)  
*Counsel for FRON bn, LLC*

**EXHIBIT A**



**PROJECT DETAILS**

|                         |               |
|-------------------------|---------------|
| Site latitude           | 37°38'18.12"N |
| Site longitude          | 85°16'12.91"W |
| PV DC capacity          | 148.276MWp    |
| PV AC capacity at POI   | 120 MWac      |
| DC AC ratio at POI      | 1.235         |
| Evacuation voltage      | 138 kV        |
| Module wattage          | 615/620Wp     |
| Module type             | Bifacial      |
| Module quantity (615Wp) | 204008        |
| Module quantity (620Wp) | 36792         |
| Module per string       | 28            |
| Total strings           | 8600          |
| Tracker_4 String        | 1124          |
| Tracker_3 String        | 877           |
| Tracker_2 String        | 731           |
| Tracker_1 String        | 11            |
| PV Inverter rating      | 4.4MWac       |
| PV Inverter Type        | Central       |
| PV Inverter quantity    | 33            |
| Racking type            | Tracker       |
| Pitch                   | 21°-1"        |
| Ground coverage ratio   | 37%           |
| Limits of Disturbance   | 793 Acres     |



**LEGEND:-**

| SYMBOL | DESCRIPTION          |
|--------|----------------------|
| ---    | SITE BOUNDARY        |
| ---    | SITE FENCE           |
| ---    | SETBACK LINE         |
| ---    | COUNTY ROAD          |
| ---    | TRACKER              |
| ---    | INVERTER SKID        |
| ---    | PLANT INTERNAL ROADS |
| ---    | WETLAND              |
| ---    | STORM WATER BASINS   |
| ---    | RESIDENTIAL SETBACK  |

**LEGEND:-**

| SYMBOL | DESCRIPTION                       |
|--------|-----------------------------------|
| ---    | ACCESS GATE                       |
| ---    | PROPOSED 138KV GEN-TIE LINE ROUTE |
| ---    | FLOOD AREA                        |
| ---    | NATURAL DRAIN                     |
| ---    | COUNTY BOUNDARY LINE              |
| ---    | EXCLUSION AREA                    |
| ---    | PROPOSED GEN TIE STRUCTURE        |
| ---    | MV COLLECTION LINE ROUTE          |
| ---    | LAYDOWN AREA                      |
| ---    | NATIVE POLLINATOR SEED            |
| ---    | PROPOSED LANDSCAPE SCREENING      |

**Notes-**  
 \* All Dimensions Are in Feet.  
 \* Coordinates System :- NAD83 Kentucky State Plane, South Zone, US Foot.

| DATE       | REV. | REVISION HISTORY | DRN. BY | CKD. BY | APPD. BY |
|------------|------|------------------|---------|---------|----------|
| 2026-03-06 | 00   | FIRST ISSUE      | TJ      | YS      | KP       |

**BRIGHT NIGHT** BrightNight Power

PROJECT NAME: FRONTIER

DRAWING TITLE: PLANT LAYOUT (PV)

| SCALE   | PURPOSE CODE     | SHEET SIZE | REV. | SHEET  |
|---------|------------------|------------|------|--------|
| 1"=950' | ISSUE FOR PERMIT | 36" x 24"  | 00   | 1 OF 1 |

NOTE :-  
 1. All rights reserved. This drawing contains proprietary information which is protected by copyright. No part of this drawing may be reproduced, translated in computer language, or transmitted in any form whatsoever without the prior written consent of BrightNight Power.