

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE ELECTRIC GENERATION**  
**AND TRANSMISSION SITING BOARD**

In the Matter of:

ELECTRONIC APPLICATION OF LYNN )  
BARK ENERGY CENTER, LLC FOR A )  
CERTIFICATE OF CONSTRUCTION FOR AN )  
UP TO 200 MEGAWATT MERCHANT )  
ELECTRIC SOLAR GENERATING FACILITY )  
IN MARTIN COUNTY, KENTUCKY )

Case No. 2024-00104

**LYNN BARK ENERGY CENTER, LLC'S RESPONSES TO**  
**POST-HEARING DATA REQUESTS**

- 1 Provide a copy of all environmental surveys completed by Lynn Bark Energy, including Phase I Environmental Assessment.

**RESPONSE:** The following is a list of all environmental surveys and reports that have been completed by Lynn Bark Energy:

- A copy of the Phase I Environmental Site Assessment is included as **Attachment A**;
- A copy of the Cultural Desktop Memo is included as **Attachment B**;
- A copy of the Protected Species Habitat Assessment is included as **Attachment C**;
- A copy of the Wetland Delineation is included as **Attachment D**;
- A copy of the Mining Permits, Bonds, Oil & Gas Report is included as **Attachment E**; and
- A copy of the Draft Complaint Resolution Plan is included as **Attachment F**.

*Response Provided by: Christina Martens, Savion*

- 2 Provide the Wetland Delineation Report.

**RESPONSE:** As noted above a copy of the Wetland Delineation is included as **Attachment D**.

*Response Provided by: Christina Martens, Savion*

- 3 Provide a table with the distances from the nearest nonparticipating residence (dwelling not property line) to the following:
- a. Fencing.
  - b. Closet solar panel.
  - c. Closest inverter.
  - d. Substation.

**RESPONSE:** A copy of the requested table is included as **Attachment G**. See also Attachment E to Lynn Bark Energy’s responses to the Second Set of Data Requests. For ease of references, the distances from the nearest nonparticipating residence to relevant Project components are as follows:

- a. Fencing<sup>1</sup>: 1,053 feet
- b. Closet solar panel: 1,911 feet
- c. Closest inverter: 2,179 feet
- d. Substation: 4,981 feet

*Response Provided by: Justin Ahn, ERM*

- 4 Refer to the motion for deviation from the setback requirements.<sup>2</sup> For the closest residence (dwelling not property line) in each neighborhood provide a table with the distance to the following:
- a. Fencing.
  - b. Closet solar panel.
  - c. Closest inverter.
  - d. Substation.

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<sup>1</sup> The fencing is typically 10’ to 20’ outside of the panel array. The distances provided in this response are to the Project Boundary Line, not the Project fence line. The entire Project Site will not be fenced, only the panel array areas. The approximate distance to the proposed fence would be closer to the distance to a solar panel minus 20’.

<sup>2</sup> Motion for Deviation from Setback Requirements (filed on June 12, 2024).

**RESPONSE:** A copy of the requested table is included as **Attachment H**. See also Attachment E to Lynn Bark Energy’s responses to the Second Data Requests. The distances from the nearest residence within each of the two identified neighborhoods are as follows:

a. Fencing<sup>3</sup>:

- Neighborhood 1: 703 feet
- Neighborhood 2: 478 feet

b. Closet solar panel:

- Neighborhood 1: 2,287 feet
- Neighborhood 2: 1,578 feet

c. Closest inverter:

- Neighborhood 1: 2,779 feet
- Neighborhood 2: 2,270 feet

d. Substation:

- Neighborhood 1: 6,954 feet
- Neighborhood 2: 6,905 feet

*Response Provided by: Justin Ahn, ERM*

5 Confirm the distance Lynn Bark Energy is requesting for a setback.

**RESPONSE:** Lynn Bark Energy Center is requesting a 500-foot reduction in the 2,000-foot statutory setback from residences contained within a “residential neighborhood.” A setback of 1,500 feet is expected to accommodate the distance of 1,578 feet between the closest solar panel and any residence contained within a “residential neighborhood.”

*Response Provided by: Christina Martens, Savion, and Justin Ahn, ERM*

6 Provide the job qualifications for an Operations and Maintenance worker for the Lynn Bark Energy project.

**RESPONSE:** The primary qualifications for an Operations and Maintenance worker for the Lynn Bark Energy Center are as follows:

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<sup>3</sup> The fencing is typically 10’ to 20’ outside of the panel array. The distances provided in this response are to the Project Boundary Line, not the Project fence line. The entire Project Site will not be fenced, only the panel array areas. The approximate distance to the proposed fence would be closer to the distance to a solar panel minus 20’.

- Be able to inspect, evaluate, test, repair, and maintain solar equipment and systems;
- Know how to use test equipment and other tools to diagnose problems in malfunctioning systems and fix issues accordingly;
- Be able to inspect, evaluate, test, repair, and maintain a multitude of other related machinery and tools, including mounting hardware, combiner fuse boxes, inverters, switchgear, circuit breakers, transformers, batteries, data acquisition systems, relays, programmable logic controllers, meters, weather stations, and other components;
- Be able to use a variety of tools including power tools, measuring devices, and testing devices such as multimeters and megohmmeters;
- Work as part of a team to manage and train other employees on the operations and maintenance of solar systems;
- Have the ability to engage in physically demanding work, including climbing ladders, lifting heavy objects, or replacing materials; and
- Have managed projects and related supply orders, paperwork, and staff schedules.

*Response Provided by: Caleb Lemoine, Savion*

7 Provide the pay rate and benefit package for a construction worker for this Project.

**RESPONSE:** Current estimates of the pay rates per hour for applicable types of construction workers for a project like this Project are:

- Carpenters - \$24.00 to \$49.00
- Cement Masons - \$22.00 to \$40.00
- Electricians - \$27.00 to \$55.50
- Iron Workers - \$28.00 to \$57.50
- Laborers - 20.00 to \$41.00
- Operating Engineers - \$26.00 to \$54.00
- Teamsters - \$26.00 to \$47.00

A typical benefits package can be expected to include medical, dental, and vision insurance, paid time off (PTO), sick leave, and retirement plans like a 401(k). There may be some differences based on the EPC company.

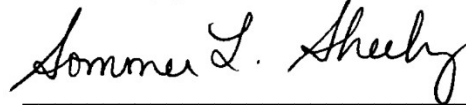
*Response Provided by: Caleb Lemoine, Savion*

8 Explain in detail the role that Bay.Wa.r.e will have in regard to operation and maintenance.

**RESPONSE:** Bay.Wa.r.e currently has no role in Lynn Bark Energy Center. It is contracted to provide O&M services for Martin County Solar Project. Once Lynn Bark Energy Center and Martin County Solar Project Phase II come online, it is likely that all O&M services would be brought in house to Savion or could be contracted to a different party. It is too early to tell if Bay.Wa.r.e's involvement would continue beyond the current contract.

*Response Provided by: Christina Martens, Savion*

Respectfully submitted,



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