

COMMONWEALTH OF KENTUCKY
BEFORE THE ELECTRIC GENERATION
AND TRANSMISSION SITING BOARD

In the Matter of:

ELECTRONIC APPLICATION OF PIKE)
COUNTY SOLAR PROJECT, LLC FOR A)
CERTIFICATE OF CONSTRUCTION FOR AN)
UP TO 100 MEGAWATT MERCHANT)
ELECTRIC SOLAR GENERATING FACILITY)
IN PIKE COUNTY, KENTUCKY)

Case No. 2024-00105

PIKE COUNTY SOLAR PROJECT, LLC'S RESPONSES TO
POST-HEARING DATA REQUESTS

- 1 Confirm whether or not Surface Mine Permit 898-0881 which is 223.69 acres is included in the acreage for Pike County Solar project. If not confirmed, explain why not.

RESPONSE: Surface Mine Permit 898-0881 is included in the acreage for the Pike County Solar Project.

Response Provided by: Jeannine Johnson, Savion

- 2 Provide a copy of all environmental surveys completed by Pike County Solar, including Phase I Environmental Assessment.

RESPONSE: The following is a list of all environmental surveys and reports that have been completed by Pike County Solar:

- 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**; and
- A copy of the Draft Complaint Resolution is included as **Attachment E**.

Response Provided by: Christina Martens, Savion

3 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

4 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 F**. See also Attachment D to Pike County Solar’s Responses to the Second Data Requests. For ease of references, the distances from the nearest nonparticipating residence to relevant Project components are as follows:

- a. Fencing¹: -15.8 feet²
- b. Closet solar panel: 1,199 feet
- c. Closest inverter: 1,753 feet
- d. Substation: 1,846 feet

Response Provided by: Justin Ahn, ERM

¹ 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’. In addition, no Project infrastructure will be placed outside of leased property.

² Current spatial data depicts this structure within the project boundary due to minor spatial projection error. No structures will be located within the final project boundary.

5 Refer to the motion for deviation from the setback requirements.³ 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.

RESPONSE: A copy of the requested table is included as **Attachment G**. See also Attachment D to Pike County Solar’s Responses to the Second Data Requests. For ease of reference, the distances from the nearest residence within each of the eight identified “residential neighborhoods” are as follows.

a. Fencing⁴:

- Neighborhood 1: 1,314 feet
- Neighborhood 2: -15.8 feet⁵
- Neighborhood 3: 1,164 feet
- Neighborhood 4: 708 feet
- Neighborhood 5: 1,945 feet
- Neighborhood 6: 1,719 feet
- Neighborhood 7: 921 feet
- Neighborhood 8: 1,571 feet

b. Closet solar panel:

- Neighborhood 1: 3,812 feet
- Neighborhood 2: 2,453 feet
- Neighborhood 3: 2,377 feet
- Neighborhood 4: 1,880 feet
- Neighborhood 5: 3,537 feet
- Neighborhood 6: 3,084 feet

³ Motion for Deviation from Setback Requirements (filed on May 14, 2024).

⁴ 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’. In addition, no Project infrastructure will be placed outside of leased property.

⁵ Current spatial data depicts this structure within the project boundary due to minor spatial projection error. No structures will be located within the final project boundary.

- Neighborhood 7: 2,119 feet
- Neighborhood 8: 2,941 feet

c. Closest inverter:

- Neighborhood 1: 4,554 feet
- Neighborhood 2: 3,132 feet
- Neighborhood 3: 2,816 feet
- Neighborhood 4: 2,542 feet
- Neighborhood 5: 3,990 feet
- Neighborhood 6: 3,526 feet
- Neighborhood 7: 2,962 feet
- Neighborhood 8: 3,782 feet

d. Substation:

- Neighborhood 1: 9,903 feet
- Neighborhood 2: 4,148 feet
- Neighborhood 3: 2,263 feet
- Neighborhood 4: 4,581 feet
- Neighborhood 5: 6,361 feet
- Neighborhood 6: 5,874 feet
- Neighborhood 7: 10,865 feet
- Neighborhood 8: 12,628 feet

Response Provided by: Justin Ahn, ERM

6 Confirm whether Shell New Energies US, LLC have had any violations of federal or state environmental laws, rules, or administrative regulations resulting in criminal convictions or administrative fines exceeding \$5,000. Also provide the status of any pending action, whether judicial or administrative actions.

RESPONSE: Shell New Energies US, LLC has no pending actions or violations of federal or state environmental laws, rules, or administrative regulations resulting in criminal convictions or administrative fines exceeding \$5,000.

Response Provided by: Christina Martens, Savion

7 Confirm whether the interconnection service agreement is between Pike County Solar and AEP. If not explain who the parties are in the interconnection agreement.

RESPONSE: Yes. A copy of the Interconnection Service Agreement is included as **Attachment H**. It provides that the agreement is by and among PJM Interconnection, LLC, Pike County Solar Project, LLC and Kentucky Power Company. In turn, Kentucky Power Company is defined as the “Interconnected Transmission Owner” or “AEP.”

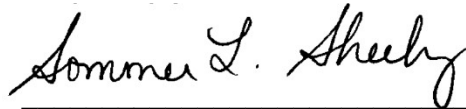
Response Provided by: Jeannine Johnson, Savion

- 8 Confirm the distance Pike County Solar is requesting for a setback.

RESPONSE: Pike County Solar Project is requesting a 200-foot reduction in the 2,000-foot statutory setback from residences contained within a “residential neighborhood.” A setback of 1,800 feet is expected to accommodate the distance of 1,880 feet between the closest solar panel and any residence contained within a “residential neighborhood.”

Response Provided by: Jeannine Johnson, Savion

Respectfully submitted,



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