

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

In the Matter of:

ELECTRONIC APPLICATION OF CRAB)	
RUN SOLAR PROJECT, LLC FOR A)	
CERTIFICATE OF CONSTRUCTION FOR)	Case No. 2025-00276
AN UP TO 45 MEGAWATT MERCHANT)	
ELECTRIC SOLAR GENERATING)	
FACILITY IN MARION COUNTY,)	
KENTUCKY)	

CRAB RUN SOLAR PROJECT, LLC'S RESPONSE TO
SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION

1. Provide the anticipated start date and end date of construction.

RESPONSE: The anticipated start date of construction is June 2029, and the anticipated end date of construction is June 2030.

2. Provide any communication with the Marion County Road Department relating to traffic plans and mitigation measures. If no communication has been initiated, explain when that contact will occur.

RESPONSE: No communication has occurred with the Marion County Road Department to date. Contact will occur ahead of the start of construction, when an EPC has been selected.

3. Explain whether participating landowners will continue to use property not leased to the Applicant for residential or agricultural purchases.

RESPONSE: The unleased portions of the property are expected to remain under the same ownership and current use. With that said, the Project cannot guarantee what the owners' use will be in the future.

4. Provide a map showing all planned areas of vegetative clearing. Include on the map satellite imagery, wetland features, and elevation contours.

RESPONSE: A map showing all planned areas of maximum vegetative clearing for the Project is included as **Attachment A**.

5. Confirm whether all fencing, installed according to National Electrical Safety Code (NESC) standards, will be installed prior to the commencement of any electrical work. If not confirmed, explain when the fencing will be installed.

RESPONSE: Confirmed.

6. The proposed substation site, switchyard site, and gen-tie corridor all sit in an area where karst and especially sinkholes are prevalent. Provide the following:

- a. Whether relocation of these sites is possible or feasible.

RESPONSE: The boundaries held for the substation and switchyard are conservative land estimates, and the constructed substations will be designed with an appropriate setback from any identified karst / sinkholes as informed by the final Geotech results.

- b. Explain the mitigation measures Crab Run Solar will implement during construction to combat karst should these sites be used.

RESPONSE: Conservative setbacks will be applied to all known karst areas at the project site during construction. Access to identified karst and sinkhole features will be restricted during construction to ensure the setback is not infringed upon.

- c. Explain the foundation(s) each site will have.

RESPONSE: The substations will be on graded areas covered in gravel rock. There will be concrete foundations used to support various equipment, designed based upon the results of the final geotechnical review.

7. All other qualifications for the positions being equal, explain whether Crab Run Solar intends to hire as many local workers for the construction and operation phases of the project as possible. If so, include how Crab Run Solar intends to accomplish this goal.

RESPONSE: As explained in Applicant's response to Request No. 60 to the Board's First Set of Data Requests ("DR1"), Applicant will hire as many local workers as feasible, depending on availability of local workers to fill the positions needed for the construction and operation of the Project. To accomplish this goal, Applicant will utilize local channels

for employee recruitment first and resort to non-local channels only to fill gaps in the Project's workforce due to local supply or skill-set.

8. Explain whether a power purchase agreement (PPA) has been finalized. If not, provide a timeline for drafting and finalizing a PPA.

RESPONSE: A PPA has not yet been finalized and will likely be obtained in Q2-Q4 2027, once the interconnection process is complete.

9. Provide any updates to vegetative screening plans.

RESPONSE: The vegetative screening plan remains as presented in the Landscape Plan (Application, Tab 12, Exhibit F). There are 3 locations on site where vegetative screening is planned. The west property line, a section of the east property line, and a short distance along Arthur Mattingly Road from the east property line to the site entrance. The screening is proposed to be a double row of trees and shrubs planted in a staggered pattern to provide a fuller screen at maturity.

10. Provide the name of the company that will employ the individuals that are or will be responsible for ensuring compliance with the statements in the Application, as well as any conditions imposed by the Siting Board during construction and operation of the project.

RESPONSE: Crab Run Solar Project, LLC.

11. Explain any commitments regarding infrastructure removal or land restoration during decommissioning, including in the landowner lease agreements.

RESPONSE: As provided in **Attachment A** to DR1, Section 6.8 of the lease agreement outlines the decommissioning requirements per the lease. The Decommissioning Plan, provided in the Application (Tab 12, Exhibit I) for further details regarding the decommissioning of the Project.

12. Provide the maximum expected load weights for each type of delivery truck, including cement and water trucks, heavy equipment, gravel for access roads, panels, inverters, and the transformer.

RESPONSE: The Project has not yet chosen an EPC contractor nor finalized the construction schedule and therefore does not have the specifics for the maximum expected load weights for each type of delivery truck. Based on the traffic and economics reports and our experiences at the Martin County Solar Project (Case No. 2022-00362, an

approximately 111 MW project), Applicant estimates that only a few heavy duty/oversized truck deliveries will be needed throughout the entire construction period. Greater detail will be known closer to construction. The Main Power Transformer (MPT) is the heaviest piece of equipment to be delivered to the site. There will be a unique delivery plan for the MPT.

Additionally, for reference the following data was obtained relative to deliveries for the Martin County Solar Project:

Vehicle	Expected Load Weights
Cement Truck	20,000-30,000lb truck 60,000-70,000 max load weight
Water Truck	13,260lb-21,100lbs
Module Delivery Container	42,000 lbs
Main Power Transformer	237,094 lbs.

13. Provide the average number of on-site vehicles each day over the course of the construction period.

RESPONSE: As discussed in Applicant’s response to DR1, Request No. 43 and the Traffic Impact Study (Application, Tab 12, Exhibit H), Applicant anticipates approximately 100 vehicles on average will visit the Site each day. Applicant will have more specific details regarding on-site construction vehicles once the Applicant has chosen an EPC contractor and set a construction schedule.

14. Provide the peak daily number of construction vehicles accessing the site, identified by vehicle type (i.e., worker vehicles, delivery trucks, cement trucks, water trucks, tractor trailers, or other types of general delivery trucks if utilized).

RESPONSE: As discussed in Applicant’s response to DR1, Request No. 43, Applicant anticipates a maximum of approximately 200 vehicles to visit the Site during peak

construction activity. This number is a conservative estimate, and Applicant expects this amount of vehicle traffic at the Site to be infrequent. The Project has not yet chosen an EPC contractor nor finalized the construction schedule and therefore does not have the specific construction vehicles information, however, Applicant generally expects:

- approximately 150 worker vehicles
- approximately 30 specialty vehicles (specialized crews, small delivery vehicles, water trucks, etc.)
- approximately 20 heavy delivery trucks

15. Explain how the debris from vegetation clearing is going to be disposed of.

RESPONSE: Debris from vegetation clearing will be managed in coordination with the EPC but is anticipated to be mulched or burned onsite and compliant with applicable burn law or restriction periods.

16. Provide a table with the distances from the nearest nonparticipating residence (dwelling not property line) to the following:

RESPONSE: A table with distances from all residences within 2,000 feet of the Project to nearest feature is provided as **Attachment B**. Requested detail of the distances from nearest nonparticipating residence to each of the following are provided below.

a. Fencing.

RESPONSE: The nearest nonparticipating residence to Project fence is 3250 Frogtown Road at 166 feet.

b. Closest Solar Panel.

RESPONSE: The nearest nonparticipating residence to Project solar panel is 3250 Frogtown Road at 335 feet.

c. Closest Inverter.

RESPONSE: The nearest nonparticipating residence to Project inverter is 3180 Frogtown Road at 657 feet.

d. Substation.

RESPONSE: The nearest nonparticipating residence to Project substation is 480 Arthur Mattingly Road at 1,699 feet.

e. Battery Storage System.

RESPONSE: Not applicable as a BESS is not part of the Project.

17. Explain the justification for requesting a deviation from the 2,000-foot setback requirement for residential neighborhoods.

RESPONSE: A deviation from the 2,000-foot setback requirement is justified here because the Project is designed to, and, as located, would meet the goals of the KRS 224.10-280, 278.010, 278.212, 278.214, 278.216, 278.218, and 278.700 to 278.716 at a closer distance. As discussed further in Applicant's Motion for Deviation, filed on Jan. 29, 2026, and the Cumulative Environmental Assessment (CEA) (Application, Tab 5, Attachment C), the Project will have minimal adverse impacts on the environment and will utilize BMPs to minimize any potential impacts to nearby landowners. Regarding noise, noise disruption from the operation of the Project will be minimal, as operational sound levels will fall below the ambient sound level in the area. Noise may rise above ambient levels during certain points of construction (e.g., pile driving), however, this will be temporary in nature. (Application, Tab 12, Exhibit D). As reported in the Glare Analysis Memorandum, no glare from the Project is anticipated. (Application, Tab 12, Exhibit G). Finally, the Traffic Impact Study concludes that traffic will not be adversely impacted during construction or operation. (Application, Tab 12, Exhibit H). Because the Projects meets the statutory goals designated in KRS 278.704(4), a deviation from the statutory setback requirement is warranted here.

18. Explain whether the solar panels and other structures could be reconfigured within the site boundaries to comply with the 2,000-foot setback.

RESPONSE: Given the site size and constraints, the Project could not be reconfigured within the site boundaries to comply with the 2,000-foot setback. A map has been provided as **Attachment C** to reflect the impact to the Project assuming a 2,000ft setback.

19. Refer to the January 23, 2026 motion for deviation. Provide a parcel map for the residential neighborhoods. For each parcel, provide the total acreage and whether the parcel has a residential structure on the land. If there is a structure on the parcel explain the structure's design, historical use, and current condition.

RESPONSE: See **Attachment D** providing the parcel map for the residential neighborhoods, **Attachment B**, providing a table detailing the requested information for parcels in Neighborhoods 1 and 2, and **Attachment E**, providing a table detailing the requested information for parcels in Neighborhood 3.

20. Provide a table that includes each of the residences in the residential neighborhood. In the table, provide the following:

RESPONSE: See **Attachment B** and **Attachment E** to Applicant's Responses to DR2.

a. Parcel ID

RESPONSE: See attached table(s).

b. Landowner.

RESPONSE: See attached table(s).

c. Acreage.

RESPONSE: See attached table(s).

d. Structure, design and historical use.

RESPONSE: See attached table(s).

21. Provide a detailed table for each of the parcels provided in response to Item 20 stating the distance measurement in feet (not meters) from each structure, if applicable, to the items listed below:

RESPONSE: See **Attachment B** and **Attachment E** to Applicant's Responses to DR2.

a. The distance to the boundary line.

RESPONSE: See provided table(s). The 565 Arthur Mattingly Road residence is not part of any identified Neighborhoods and is the nearest nonparticipating residence to the Project boundary line at 120 feet.

b. The distance to the closest solar panel.

RESPONSE: See provided table(s).

c. The distance to the nearest inverter.

RESPONSE: See provided table(s).

d. The distance to the substation.

RESPONSE: See provided table(s).

e. The distance to the BESS.

RESPONSE: Not applicable as a BESS is not part of the Project.

22. Provide a table with the distances from the nearest nonparticipating residence (dwelling not property line) to the following:

RESPONSE: See **Attachment B** and **Attachment E** to Applicant's Responses to DR2.

a. Fencing.

RESPONSE: The 3250 Frogtown Road residence is part of Neighborhood 1 and is the closest non-participating residence to a Project fencing at 166 feet.

b. Closest Solar Panel.

RESPONSE: The 3250 Frogtown Road residence is part of Neighborhood 1 and is the closest non-participating residence to a Project solar panel at 335 feet.

c. Closest Inverter.

RESPONSE: The 3180 Frogtown Road residence is part of Neighborhood 1 and is the closest non-participating residence to a Project inverter at 657 feet.

d. Substation.

e. **RESPONSE:** The 480 Arthur Mattingly Road residence is not part of any identified Neighborhoods and is the closest non-participating residence to the Project substation at 1,699 feet.

f. Battery Storage System

RESPONSE: Not applicable as a BESS is not part of the Project.

23. Refer to the motion for deviation from the setback requirements. For the closest residence (dwelling not property line) in each neighborhood, provide a table with the distance to the following:

RESPONSE: See **Attachment B** and **Attachment E** to Applicant's Responses to DR2. All Neighborhood 3 residences are located greater than 2,000 feet from the Project boundary and infrastructure.

- a. Fencing.

RESPONSE: The 3250 Frogtown Road residence is the closest Neighborhood 1 non-participating residence to a Project fencing at 166 feet. The 455 Arthur Mattingly Road residence is the closest Neighborhood 2 non-participating residence to a Project fencing at 773 feet.

- b. Closest Solar Panel.

RESPONSE: The 3250 Frogtown Road residence is closest Neighborhood 1 non-participating residence to a Project solar panel at 335 feet. The 455 Arthur Mattingly Road residence is closest Neighborhood 2 non-participating residence to a Project solar panel at 891 feet.

- c. Closest Inverter.

RESPONSE: The 3180 Frogtown Road residence is closest Neighborhood 1 non-participating residence to a Project inverter at 657 feet. The 455 Arthur Mattingly Road residence is closest Neighborhood 2 non-participating residence to a Project inverter at 1,755 feet.

- d. Substation.

RESPONSE: The 421 Arthur Mattingly Road residence is closest Neighborhood 1 non-participating residence to the Project substation at 2,613 feet. The 3010 Frogtown Road residence is closest Neighborhood 2 non-participating residence to the Project substation at 4,900 feet.

- e. Battery Storage System

RESPONSE: Not applicable as a BESS is not part of the Project.

- 24. Provide a parcel map of the proposed site. Include all residences within 500 feet of the proposed project site. Identify the residences as participating or nonparticipating homes.

RESPONSE: See **Attachment F** to Applicant's Responses to DR2.

- 25. Provide the entities with a direct ownership interest in Crab Run Solar. Include in the response the corporate structure of those entities.

RESPONSE: Crab Run Solar Project, LLC is wholly owned by Savion, LLC. Savion LLC is a Delaware limited liability company. Crab Run Solar Project, LLC is a Delaware limited liability company that is foreign-qualified in Kentucky.

26. Refer to Crab Run Solar’s response to Siting Board Staff’s First Request for Information (Staff’s First Request), Item 99. Identify and provide a description of the historic resource labelled ‘MN 556’ in the map provided in the response.

RESPONSE: Crab Run Solar Project’s response to DR1, Attachment P (Cultural Resources Memorandum), includes a summary of historic resource MN 556 on page 3 as “MN 556 was a late 19th-century log cabin situated along the eastern boundary of the Project Area. The structure was not evaluated for NRHP listing and based on current aerial imagery, appears to have been demolished.”

27. Provide all communication that has occurred with Kentucky Utilities Company and East Kentucky Power Cooperative, Inc. regarding transmission lines that intersect the project.

RESPONSE: No communication has occurred other than that of the standard interconnection process. EKPC is aware of the PJM application for interconnection. There has been no communication with Kentucky Utilities to date. Communication will occur as part of later stages of the interconnection process with PJM, and prior to construction.

28. Provide any communication that has occurred with United States Fish and Wildlife Services. If none has occurred, provide when communication will take place.

RESPONSE: As indicated in Applicant’s response to DR1, Request No. 82, no coordination has been initiated with the USFWS at this time. The Project anticipates for its access road crossings at Waters of the United States to utilize the standard conditions of a US Army Corps of Engineers’ Clean Water Act Section 404 Nationwide Permit and corresponding Kentucky Division of Water General Certification. Use of a Nationwide Permit provides a federal nexus for the Project and requires compliance with the Endangered Species Act. Informal coordination with USFWS will be completed as needed prior to the initiation of construction of the Project.

29. Provide any communication that has occurred with Kentucky Department of Fish and Wildlife Services. If none has occurred, provide when communication will take place.

RESPONSE: No written coordination has been initiated with the KDFWR at this time; however, KDFWR species data was accessed via use of the Office Kentucky Nature Preserves KY-BAT tool during the site’s habitat assessment efforts. Informal coordination with KDFWR will be pursued as applicable prior to the initiation of construction of the Project.

30. Refer to Crab Run Solar’s response to Staff’s First Request, Item 97. Explain what mitigation measures the Project will implement, given the conclusions of the habitat assessment that there is a potential for federally or state listed threatened and endangered species to occur at the site.

RESPONSE: The Habitat Assessment Report provided as Attachment O to DR1 concludes potential habitat is present within the Project Area for Indiana bat (federally endangered), whooping crane (experimental population), the monarch butterfly (federal candidate), and certain bird species protected by the Migratory Bird Species Act. The Project is anticipated to have a federal nexus via Clean Water Act Section 404 permit due to impact to waters of the United States for internal access road crossing improvements, which also requires compliance with Section 7 of the Endangered Species Act. Applicant will coordinate with federal agencies as necessary prior to the initiation of construction and has committed to the following mitigation measures: tree removal to the minimum necessary for Project construction, limiting tree removal to the winter/inactive season (November 16 – March 31), and implementation of construction BMPs as detailed within the final SWPPP and SPCC.

31. Describe and explain whether the current topography of the proposed substation location is viable.

RESPONSE: The existing topography of the substation location is viable. Detailed engineering will be performed to account for necessary grading prior to construction. Geotechnical analysis will further inform siting of the substation.

32. Provide visual renderings for the proposed project substation in the current topographical area.

RESPONSE: The Visual Impact Simulations included in the Application (Tab 12, Exhibit E) were selected to represent potential offsite views of the Project. The proposed substation location shown on these simulations was selected to be internal to the project for visual and safety purposes. Portions of the substation are visible in the simulations from KOPs 104 and 105 (the closest publicly accessible KOPs to the currently proposed substation site), although the substation is not prominent in these views, due to its location. The ultimate substation location is subject to some adjustment based on further geotechnical study and is dependent on its ability to connect to the existing overhead grid system. Detailed plans for the substation will be provided to the Siting Board in the final plan set prior to the initiation of construction.

33. Describe what earth work will be done to the proposed substation site to allow for proper siting.

RESPONSE: Some grading of existing soil is expected to be performed. Fill soil may be imported based on results of soil testing on-site. The ultimate substation location and design is subject to some adjustment based on further geotechnical study.

34. Refer to the Application, SAR, Exhibit H, Traffic Impact Study. The study recommends that all truck traffic must enter the site through primary access point at Arthur Mattingly Road during construction and operations phases due to Frogtown Road's slimmer lane and 90 degree turns. Provide:

- a. An updated site plan to reflect any changes, if applicable.

RESPONSE: No updated site plan has been prepared. The most updated site plan was provided in response to DR1. The Project expects to provide an updated site plan closer to the start of construction.

- b. The weight limit of Arthur Mattingly Road.

RESPONSE: The weight limit for Arthur Matting Road is 36,000 lbs. This is the default weight limit for a county-maintained road, as there is not a different weight limit posted.

- c. Any permits that will be required for deliveries on Arthur Mattingly Road.

RESPONSE: Given the potential issues identified in Traffic Impact Study (Application, Tab 12, Exhibit H) regarding large deliveries via the Frogtown Road access road, Applicant anticipates the transformer will be delivered via one of the access roads along Arthur Mattingly Road. However, as discussed in Applicant's responses to DR1, Request Nos. 43(e), 44, and 45, neither the EPC contractor nor the specific transformer has been selected, so Applicant has not obtained any applicable permits for this delivery yet. If a permit obtained for delivery of the transformer details a certain route, Applicant will be required to comply with that route, as well as any other route requirements imposed by the transporter of the transformer. Once Applicant selects an EPC contractor, it will undertake a haul route study, providing more information regarding suitable routes.

- d. Estimated traffic increases on Athur Mattingly Road given the unavailability of Frogtown Road.

RESPONSE: The Traffic Impact Study concludes that due to the width and geometry of Arthur Mattingly and Frogtown Roads, *large* deliveries are unadvisable via the Frogtown access road (Application, Tab 12, Exhibit H, at p. 11). As demonstrated in Response to Request No. 14 and Response to DR1, Request No. 43(c), large deliveries make up a small percentage of the daily construction traffic anticipated. Therefore, Applicant does not anticipate estimated traffic increases on Arthur Mattingly Road as a result of these large deliveries.

35. Provide which road the project transformer will be delivered on and which access points will be used.

RESPONSE: Please refer to Applicant's response to Request No. 34(c).

36. Provide the weight of the project transformer and the class/type of truck that will be used to deliver it.

RESPONSE: As stated in Applicant's response to DR1, Request No. 43(e), a specific transformer has not been selected for the Project. It is anticipated to weigh between 100,000 and 200,000 pounds. The delivery will be made with a correctly permitted Class 8 delivery vehicle.

37. Provide any potential concerns about the width of Athur Mattingly Road.

RESPONSE: As detailed in the Traffic Impact Study (Application, Tab 12, Exhibit H) Arthur Mattingly Road is a narrow, local road with adequate room for one lane. While Applicant would not characterize the following considerations as "concerns," it acknowledges that it will need to engage in thoughtful and thorough planning with its EPC contractor to minimize disruptions to local landowners. It also acknowledges that, during construction, improvements or traffic controls may be needed. Applicant will consult its EPC contractor and other appropriate authorities in planning its construction schedule and deliveries. If any upgrades or improvements are required, Applicant will obtain the necessary permits and/or approvals.

38. Explain how existing internal access roads will be improved prior to construction.

RESPONSE: As described in the Proposed Site Description (Application, Tab 2), access roads will be newly constructed and will consist of graveled roads approximately 16 feet wide. This construction will include grading the land, but further requirements for their construction will be known once an EPC contractor is engaged.

39. Provide the distance between the property owners’ parcel boundaries on Frogtown Road and the proposed Project fence line.

RESPONSE: Please refer to Table 1, provided below.

Table 1. Distance between the property owner’s parcel boundaries on Frogtown Road and the proposed Project fence line.

Address	Parcel ID	Parcel Acreage (ac)	Neighborhood	Distance from Frogtown parcel boundary to nearest Project fence line*
2960 FROGTOWN ROAD	031-004	6.32	1	44
3010 FROGTOWN ROAD	031-005-06	2.22	1	38
3040 FROGTOWN ROAD	031-005-05	2.50	1	37
3042 FROGTOWN ROAD	031-005-05	2.50	1	37
3080 FROGTOWN ROAD	031-005-04	2.49	1	35
3180 FROGTOWN ROAD	031-005	6.53	1	35
3250 FROGTOWN ROAD	031-005-03	1.80	1	45
3290 FROGTOWN ROAD	031-005-08	1.50	1	58
3330 FROGTOWN ROAD	031-005-02	1.93	1	90
3366 FROGTOWN ROAD	031-005-01	1.75	1	104
3410 FROGTOWN ROAD	031-024	3.20	1	103
3470 FROGTOWN ROAD	021-142-02	1.36	1	105

* Distance to parcel 031-005-07-01 is not listed since lacks residential structure.

40. Explain whether vegetative screening along Frogtown Road will be planted along the adjoining property owners fence line or the Project fence line.

RESPONSE: The Project expects to plant the vegetative screening along the Project fence line, as this location is expected to provide better screening.

41. Explain if vegetative screening becomes more effective if it is placed further from the view of residential structures.

RESPONSE: In general, the closer the screening vegetation is to the viewer, the more effective it is at blocking ground-level views. For views from elevated locations, such as the second story of a home, having the buffer closer to the viewer could theoretically increase visibility (i.e., making it easier to see over the trees); however, the majority of homes on Frogtown Road, Pond Lane, Loretto Road, and Old KY 49 appear to be single-

story structures. Two-story structures identified as closest to the Project include 3600 Frogtown Road, 480 Arthur Mattingly Road, 6325 KY-52, and 7217 N. Loretto Road.

As provided in the Landscape Plan (Application, Tab 12, Exhibit F), the proposed double row of vegetative screening is typically 40 feet deep and has been designed to screen views from properties adjacent to the Project site (once vegetation reaches maturity). As presented in Applicant's Response to Request No. 39, the distance between the Project fenceline and the boundary of the parcels directly adjacent to the Project along Frogtown Road range from 35 to 105 feet from the Project fenceline. Similarly, the distance between the Project fenceline and the boundary of the adjacent 480 Arthur Mattingly Road parcel is approximately 50 feet from the Project fenceline. For consistency, the Project generally proposes to locate vegetation screening adjacent to the Project fenceline. One exception to this vegetation screening placement is for the short segment proposed in the southeastern corner of the Project along Arthur Mattingly Road, opposite the 545 Arthur Mattingly Road parcel. In this case, the vegetative screening would be installed within the Project boundary along the Arthur Mattingly road frontage in aims to increase the efficacy for this visual barrier.

Adjusting the location of screening vegetation within the Project site would not meaningfully affect the visibility of the Project from more distant locations (such as properties not immediately adjacent to the Project site) or from elevated locations. In those cases, topography and vegetation on non-Project properties would be the primary factor affecting visibility.

42. Refer to Crab Run Solar's response to Staff's First Request, Item 74. Provide how the project will ensure an "agricultural style fence" properly secures the site.

RESPONSE: As provided in Applicant's response to DR1, Request No. 74, the agricultural style fencing surrounding the solar arrays will meet the National Electric Safety Code (NESC) standards for securing the Project. Further securing the Project, as provided in Applicant's response to DR1, Request No. 17, the substation and POI will each be secured by separate layer of chainlink fencing with barbed wire, also meeting NESC standards.

43. Provide what setbacks the Project will apply to karst features.

RESPONSE: The Project expects to utilize a 75-foot setback from sinkholes and/or karst features, unless the results of the final geotechnical review direct another appropriate setback distance.

44. Provide copies of any letters sent to adjacent property owners regarding the Project.

RESPONSE: Please refer to the Public Information Meeting Letter included in the Application (Tab 6, Attachment E). The Public Involvement Tab of the Application (Tab 6) and Applicant's response to DR1, Request No. 58 details in-person communications with landowners, as well. Finally, the Project mailed its original public notice of the Project to

landowners bordering the Project on December 1, 2025, and mailed its re-issued public notice on February 18, 2026. The Applicant has not had any additional communication with non-participating landowners.

45. Provide pertinent information on the following in regard to the sinkhole located near the planned substation location.

a. Explain whether an alternative location for the substation has been assessed, if the sinkhole affects substation design and or construction.

RESPONSE: If the sinkhole affects the substation design and construction, it is possible that the substation could be adjusted along the transmission line, with approval needed from PJM and the utility.

b. Explain whether any alternative measures have been planned to account for potential impact on the substation's transformer oil containment system.

RESPONSE: The Applicant has not yet completed a Spill, Prevention, Control, and Countermeasure (SPCC) Plan, and therefore cannot expound on alternative measures that will be implemented to account for potential impacts on the substation's transformer oil containment system. Applicant plans to create and implement a SPCC plan in the pre-construction phase of the Project, in accordance with applicable laws and regulations. Applicant will consult with its geotechnical team during the creation of this plan to determine any necessary alternative measures for oil containment in light of the sinkhole.

c. Explain what measures are being planned to account for potential impact on the foundation(s) for the substation equipment. (i.e. Transformer, Switchgear, Breakers, and Structural Steel).

RESPONSE: The Applicant has not yet undertaken an extensive geotechnical study and therefore, cannot expound on each specific measure it will undertake to account for potential impacts on the foundations for the substation equipment. Applicant plans to complete its geotechnical study in the pre-construction phase of the Project and will adhere to the advice of its Geotech team.

d. Explain what measures are being planned to account for potential impact on the substation security fencing.

RESPONSE: The Applicant has not yet undertaken an extensive geotechnical study and therefore, cannot expound on measures it will undertake to account for potential impacts to the substation security fencing. However, Applicant intends to position the security fencing in a manner that avoids the sinkhole. Applicant plans to complete its geotechnical study in the pre-construction phase of the Project and will adhere to the advice of its Geotech team.

- e. Explain how the Project is going to stabilize the sinkhole and prevent it from expanding.

RESPONSE: The Applicant has not yet undertaken an extensive geotechnical study and therefore, cannot expound on the specific measures it may need to take to stabilize the sinkhole. Applicant plans to complete its geotechnical study in the pre-construction phase of the Project and will adhere to the advice of its Geotech team and any other applicable authorities to ensure stability of the sinkhole and safety for its employees and nearby landowners.

- 46. Explain when a decision will be made on whether an operation and maintenance building will be utilized for the project.

RESPONSE: The decision to utilize an operation and maintenance building would occur approximately 20 months prior to start of construction, once the final design has been completed.

- 47. Provide the distance the transmission line and the boundary of the right-of way (ROW), individually, will be located to the closest nonparticipating landowner

RESPONSE: As provided in the Proposed Site Description (Application, Tab 2), there is no transmission line being proposed for construction for this Project. Rather, the Project will tap into the existing EKPC 69-kV line located in the Project area (Application, Tab 7).

- 48. Provide, in detail, the communication that Crab Run Solar has had with the closest nonparticipating landowner from the transmission line or the ROW.

RESPONSE: As stated in Applicant's response to Request No. 47, there is no transmission line being proposed for this Project. As such, Applicant has not engaged in any communication with landowners regarding a transmission line.

- 49. Provide a map of the residential structures that may have a view of any portion of the Project. Differentiate between participating and nonparticipating residences.

RESPONSE: As discussed in Applicant’s response to DR1, Request No. 73, Applicant is unable to determine with certainty which residential structures may have a view of any portion of the Project without initiating a significant study, which would include entering each of the residential structures surrounding the Project. Please refer to the Exhibits A-B to Applicant’s Motion for Deviation, filed January 23, 2026 and Attachment Q to Applicant’s Responses to DR1, filed February 16, 2026, for maps depicting the proximity of the residential structures closest to the Project. As depicted in these maps, Applicant has committed to providing vegetative screening along the project boundaries where residences closest to the Project are located. This is depicted in the Visual Impact Illustrations included with the Application (Tab 12, Exhibit E).