COMMONWEALTH OF KENTUCKY

BEFORE THE ELECTRIC GENERATION AND TRANSMISSION SITING BOARD

In the Matter of:

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

CRAB RUN SOLAR PROJECT, LLC'S RESPONSE TO ELECTRIC GENERATION AND TRANSMISSION SITING BOARD'S POST-HEARING REQUEST FOR INFORMATION

1. Explain whether landowners will be notified if this project is sold to another entity. If not, please explain.

RESPONSE: If Crab Run Solar Project, LLC were to sell or transfer ownership of, or control, or the right to control Crab Run Solar Project, by sale of assets, transfer of stock, or otherwise, or abandon the same, Crab Run Solar or its successors or assigns shall request explicit approval from the Siting Board with notice of the request provided to the participating landowner. In any application requesting such abandonment, sale, or change of control, Crab Run Solar Project, LLC shall certify its compliance with KRS 278.710(1)(i).

2. Provide a table with the distances for each intervenor residence to the following:
   a. Fencing.
   b. Closest solar panel.
   c. Closest inverter.
   d. Substation.

RESPONSE: A table portraying distances from each intervenor residence to the listed infrastructure in (a) through (d) of this request is provided at **Attachment A**. This data was previously provided in the Project's responses to the Board's First Dara Request as Attachment B, with the exception that the residence of Intervenors Richard and Mary Angela Mattingly was not included as it lies greater than 2,000 feet from the Project boundary.

For purposes of clarification, in all portions of its Application and supporting evidence, the Project followed KRS 278.700(6) in defining "residential neighborhood." KRS 278.700(6) defines "residential neighborhood" as "a populated area of five (5) or more acres containing at least one (1) residential structure per acre."

Applicant's consultant ERM reviewed the area within 2,000 feet of the Project boundary to identify residential neighborhoods by the following methods utilizing ArcPro tools. Individual residences were identified via FEMA USA Structures data[1] and manually verified by aerial imagery review. Each identified residence was then assigned as the centroid to an independent five-acre circular area. Locations where five or more residence circles contiguously intersected was classified as a residential neighborhood. The boundary of each residential neighborhood was then defined and drawn as the full parcel extent of each applicable neighborhood residence. Each of the three identified residential neighborhoods was described in detail within the Project's Motion for Deviation filed on January 23, 2026. This method allots for consideration of residences in close physical proximity to adjacent residences but may be otherwise discounted by its existence within a large acreage parcel. Based on this methodology, residences within parcels 038-014-01, 038-030-06, and the Richard and Angela Mattingly intervening parcel were not included within any residential neighborhood.

For further clarification, the Project objects to any interpretation of the statutory density requirement to consistent of an area with irregular boundaries defined without method. Foe example, the Intervenors' proposed approach in their Post-Hearing Brief -- to define a 'Arthur Mattingly – Loretto Road' as additional neighborhood -- double counts residences amongst defined neighborhoods and is generated by means that are highly subjective and impossible to replicate.

The Project would not anticipate changes to its impacts or approach should additional neighborhoods be defined, however, as any addition would have greater distances from the Project than those within identified Neighborhood 1 along Frogtown Road. If the Siting Board identifies additional neighborhoods within 2,000 feet of the Project site, Crab Run requests a deviation from the statutory setback requirement as authorized by KRS 278.704(4).

3. Provide a parcel map of the proposed site. Include the intervenors' parcels and the distance of the closest panel to each intervenor's residence on the map.

[1] FEMA USA Structures. 2025. Accessed online via https://fema.maps.arcgis.com/home/item.html?id=0ec8512ad21e4bb987d7e848d14e7e24#overview

RESPONSE: A figure map portraying each intervenor parcel and its distance to closest panel is provided as **Attachment B**.

4. Explain whether solar panels could be impacted by the presence of whiskey fungus. Include in the response any studies or supporting documentation for the response.

RESPONSE: After a reasonable investigation, Applicant was not able to identify any published studies around the effects of whiskey fungus on solar panels. It is therefore unclear whether or exactly how, if at all, solar panels would be impacted by the presence of whiskey fungus in this area. It is noted that solar panels are utilized and maintained in other locations in Kentucky in which whiskey fungus is also known to be present, including within Marion County.

5. Explain how solar panels for this project will be cleaned.

RESPONSE: It is not anticipated that the solar panels for the Project will need to be cleaned, or cleaned regularly. The most effective way to clean solar panels is with natural weather sources such as rain. Should lack of rain or extreme dust conditions warrant cleaning, a water truck is typically used to wash dirt and natural buildup from the panels.

6. Refer to Application, Exhibit E, Visual Impact Simulations. Provide a visual simulation for KOP 109 with proposed conditions with a landscape buffer at the time of planting at 5-year growth and 10-year growth.

RESPONSE: The proposed conditions of the voluntary landscape buffer as submitted in the Application's landscape plan were shown as existing conditions, proposed conditions with no screening, and proposed conditions at 15-years of growth. These have been updated for KOP 109 in **Attachment C** to show existing conditions and then proposed conditions as follows (1) with no screening, (2) at the time of planting, (3) at 5-years of growth, (4) at 10-years of growth, and (5) at 15-years of growth, as requested.

These simulations continue to portray two-row configuration with growth assumptions used for eastern white pine (the row of trees closest to the solar array) and Nellie Stevens holly (the row of shrubs closest to the houses along Frogtown Road), as detailed in the table provided at **Attachment D**. The simulation that had previously been labeled "Proposed Conditions" that shows the Project features without any buffer has been retitled to "Future Conditions Without Landscape Buffer." This change clarifies that the proposed Project includes a landscape buffer. The image without a buffer is provided to demonstrate the screening effects of the buffer vegetation over time.

Additionally, the simulation for KOP 109 with 15 years of landscape buffer growth was re-generated in order to show the appropriate heights for Nellie Stevens holly in the shrub row, rather than the heights for wax myrtle that were shown in the original version of this simulation included in Exhibit E of the Application.

7. Provide additional types of fast-growing trees and shrubs that are native to Kentucky and could be utilized for this project.

RESPONSE: The table provided at **Attachment D** provides a representative list of tree and shrub species that are either native to Kentucky or that are appropriate for use in Kentucky, due to climate suitability and/or demonstrated growing success within the Commonwealth, but more specifically within the Project area.

The Project intends to select buffer vegetation from among the species listed in the attached table. It intends to use a variety of tree and shrub species in the buffer to provide visual variety and to mitigate against species-specific disease or failure due to growing conditions that are out of the ordinary for the Project site.

The Project notes that, during the April 28, 2026 Hearing for the Project, questions were posed about the suitability of wax myrtle, especially its ability to survive winters in the Project area. In Attachment D, this species has been retained as an option for the vegetative screening because it provides year-round screening and has been included in proposed vegetative buffers for another Siting Board-approved solar project within Marion County, KY (Case No. 2023-00360). If wax myrtle were to be planted by the Project and fail to thrive or to provide the necessary screening, it will be replaced with another species from the list provided.

Finally, some of the shrub species in the attached table are taller or shorter than others. The row of shrubs in the buffer is intended to fill in the potential gaps that could occur between tree trunks and beneath the canopy of mature trees. All of the shrubs listed in the attached table would fulfill this purpose.

8. Provide additional types of native species of trees and shrubs that can be utilized for vegetative screening that are more suitable for Kentucky winters.

RESPONSE: As noted in the response to Question 7, the table provided at **Attachment D** provides multiple species that are either native to central Kentucky (and thus acclimatized to the area's winter weather) or that are appropriate for winter weather.

9. Explain who is responsible for the difference in cost if the decommissioning costs exceed the bond amount.

RESPONSE: The Project's owner is responsible for the cost of decommissioning regardless of the bond amount.