

**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 6.3 MILE)
NONREGULATED TRANSMISSION LINE IN)
MARTIN COUNTY, KENTUCKY)

Case No. 2026-00096

**LYNN BARK ENERGY CENTER, LLC'S RESPONSE TO
SITING BOARD STAFF'S SECOND SET OF DATA REQUESTS**

1. Provide a narrative description of each step in the construction process from start to activation of the Project.

RESPONSE: The construction process begins with site selection, land acquisition, environmental and geotechnical studies, and engineering design. Once planning is complete, vegetation will be cleared within the approved right-of-way, and access routes will be developed while maintaining environmental protections and erosion controls. Access may include temporary roads, bridges, construction matting, and slope stabilization measures. In steep or remote terrain, helicopter access may be used to reduce the need for road construction.

After access is established, structure sites are prepared and foundations are constructed. Depending on site conditions, foundations may consist of drilled shafts, direct-embed poles, rock anchors, or reinforced concrete systems designed to withstand transmission line loads.

Transmission structures are then assembled and erected using cranes, conventional equipment, or helicopters in otherwise inaccessible locations. Helicopters may also be used to transport tower components, poles, hardware, and tools to remote locations. Once structures are installed, crews string conductors, shield wires, and fiber-optic communication cables using specialized pulling and tensioning equipment. Conductor installation may be performed using helicopters in mountainous or inaccessible areas.

Following construction, crews perform testing and commissioning activities, including inspections, grounding verification, conductor sag checks, communication system testing, and electrical commissioning. Any deficiencies are corrected before the line is energized and connected to the regional power grid. Permanent access roads and transmission rights-of-way remain in place to support ongoing inspection, maintenance, and vegetation management throughout the life of the facility.

Response Provided by: Eddie Barry

2. Provide a narrative description of how Lynn Bark Energy will deliver the transmission poles to the project site.

RESPONSE: As provided on page 3 of the Traffic Impact Study, Attachment I to Lynn Bark's responses to the Board's first set of data requests ("DR1"), the majority of deliveries are anticipated via KY-3. As the Study details, KY-3 is the "only route that provides a four-lane highway between the Interstate and the project site. Consideration was given to deliveries to the site from KY-292; however, to access the east side of the site, deliveries would have to traverse either KY-40, which is a two lane road that is approximately 21 feet wide with no shoulders or the deliveries would approach from the south and use US-52 on the West Virginia side of the Tug Fork River which is a two-lane road with twelve foot lanes and two foot paved shoulders. Utilizing US-52 would also require a bridge crossing at Kermit, KY before then traveling southbound on KY 292. KY-292 itself is a two-lane road measuring approximately 20 feet in width and doesn't provide any shoulders. All three of the mentioned routes; KY-40, US-52, and KY-292 are roads with tighter curves and harsher geometry for trucks delivering materials" than the route traveling KY-3. However, the alternative routes may still be utilized to supply materials to the eastern end of the transmission line route.

Response Provided by: Eddie Barry & Ellen Mullins

3. Provide a detailed narrative description of how the transmission line will be constructed on slopes with steeper inclines and across valleys.

RESPONSE: The design of the transmission line and placement of structures will be informed by detailed geotechnical investigations, topographic surveying, and access planning to identify stable structure locations and suitable construction routes. Structures will be placed on ridges, benches, or other stable landforms to minimize earthwork and reduce impacts on sensitive areas. Where terrain is particularly steep, temporary access roads may be limited, and helicopters may be used to transport poles, tower sections, materials, equipment, and crews directly to structure sites. Structure foundations will be designed to match site-specific ground conditions and may include drilled shafts, rock anchors, micropiles, or reinforced concrete foundations capable of resisting slope movement, wind loading, and conductor tension forces.

Where possible, transmission structures will be located outside the valley floor, allowing conductors to span from one side of the valley to the other. These longer spans reduce the need for construction activities within streams, wetlands, or environmentally sensitive areas. Specialized tension-stringing equipment will be used to install conductors while maintaining required clearances above terrain and obstacles. In rugged terrain, helicopters may assist with pilot-line installation and conductor stringing operations. Permanent access improvements will be limited to those necessary for future inspection and maintenance, helping to reduce long-term impacts while ensuring reliable operation of the transmission line throughout its service life.

Response Provided by: Eddie Barry

4. Describe how a helicopter would be utilized during the construction phase of the Project.

RESPONSE: During the construction phase of the Project, helicopters may be used to deliver steel poles, lattice tower sections, construction materials, specialized equipment, and crews to locations with challenging terrain. Helicopters may also be utilized for installation of pilot ropes and conductor stringing operations.

Response Provided by: Eddie Barry

5. Provide what Best Management Practices (BMPs) will be used for placing poles on steeper inclines.

RESPONSE: To safely construct transmission structures on steep slopes, the Project will utilize engineering, erosion-control, and access-management BMPs to minimize impacts that may include but are not limited to:

- Site specific geotechnical evaluation to inform structure locations and foundation design
- Minimized grading and benching to reduce disturbance and maintain natural slope stability
- Specialized foundations such as drilled shafts, rock anchors, micropiles, or reinforced concrete foundations as required by terrain and subsurface conditions
- Limiting tree removal actions to only that which is necessary for construction and long-term right-of-way maintenance.
- Erosion and sediment controls, such as silt fence, sediment traps, water-diversion structures, erosion-control blankets, mulch, and temporary stabilization measures, installed before and during construction.
- Slope stabilization measures, including proper drainage, slope armoring, retaining features where warranted, and revegetation of disturbed areas following construction.
- Limited access construction techniques, including use of helicopters, matting, or existing access corridors to reduce the need for new roads and minimize ground disturbance on steep terrain.
- Stormwater Management BMPs to control runoff, and protect nearby streams, wetlands, and drainage features.

Additionally, since transmission poles are anticipated to be installed primarily on ridge tops and higher elevations, some intervening valleys and lower-lying areas may not require disturbance which would further assist in maintaining slope stability.

Response Provided by: Eddie Barry & Ellen Mullins

6. Provide whether any oversize permits will be required for the delivery of Project components during the construction phase of the Project.

RESPONSE: The Project anticipates that the delivery of pole materials may require oversized load transport on Kentucky roadways. Any applicable oversize transportation permits from the Kentucky Transportation Cabinet will be coordinated and acquired prior to transport. The Traffic Impact Study, provided as Attachment I of the Lynn Bark's responses to DR1, recommends that all oversized deliveries be scheduled during off-peak hours to mitigate any potential impacts. For oversized loads using local or county roads not maintained by the state, coordination with local county officials would be anticipated, as state permits do not cover local road liability. Coordination with state and local officials has not yet begun and may include input from the EPC when selected.

Response Provided by: Eddie Barry & Ellen Mullins

7. Provide a list of all roads that will be used during the construction phase of the project. Include in the response: number of lanes, road width, weight limit, average daily traffic volume, and a map showing the proposed roads in relation to the transmission line.

RESPONSE: Roads proposed for use during the construction phase of the Project and the requested information regarding those roads are identified and detailed on pages 3-9 within the Traffic Impact Study, provided as Attachment I to the Project's responses DR1. The map showing proposed roads in relation to the transmission line is also included in Figure 1 on page 4 of Attachment I. Please also refer to Lynn Bark's response to Request 8 of the Board's second set of data requests ("DR2") below.

Response Provided by: Ellen Mullins

8. Confirm that the transmission line route will only be accessed from the Lynn Bark Solar Project. If unable to confirm, identify all other roads that will be used. Include the following:
 - a. The weight limit;
 - b. Width; and
 - c. Any permits required for the use of those roads.

RESPONSE: As previously described in Lynn Bark’s response to Request 58 of DR1, there will be three main access points to the transmission line. The main access point will be from the Lynn Bark Solar site along KY-3, with the primary delivery route additionally utilizing US-23, KY-1428, and KY-645. The second access point will be off S Wolf Creek Rd (KY-1439). The third access site will be off S Wolf Creek Road via the Martin County Solar Project. As further detailed in the Traffic Impact Study, provided as Attachment I to Lynn Bark’s responses to DR1, deliveries to the eastern portion of the transmission line would traverse either KY-40 or US-52. Utilizing US-52 would require a bridge crossing at Kermit, KY, before then traveling southbound on KY-292 and KY-1439. N Wolf Creek Rd (KY-1714) is not considered an access point but could be utilized for deliveries.

- a. **Weight Limit** - Kentucky Revised Statute (KRS) 189.222 and West Virginia Code §17C-17 require weight limits on the state-maintained highway system. Road Weight Limits were identified as shown in Table below.

Road Name	Road Weight Limit * (lbs)
US-23	80,000
KY-645	80,000
KY-3	80,000
KY-1428	80,000
KY-40	62,000
KY-292	62,000
US-52	80,000
KY-292	62,000
KY-1439	44,000
KY-1714	44,000

* KYTC [Weight Class.pdf](#) &
WVDOT [z:\Personal\rp\Gross Weight Limit Jan 05.dgn](#)

- b. **Road Width** - Details for road widths of each route are provided as follows:

- US-23: 12 feet wide lanes, two thru lanes in each direction, a two-way left turn lane, and wide shoulders (approximately 10') on both sides of the roadway.
 - KY-645: 12 feet wide lanes, two thru lanes in each direction, a two-way left turn lane, and wide shoulders (approximately 10') on both sides of the roadway.
 - KY-3: 12 feet wide lanes, two thru lanes in each direction, a two-way left turn lane, and wide shoulders (approximately 10') on both sides of the roadway.
 - KY-1428: 12 feet wide lanes, two thru lanes in each direction, a two-way left turn lane, and wide shoulders (approximately 10') on both sides of the roadway.
 - KY-40: 10.5 feet wide lanes, one lane in each direction, and no shoulders on both sides of the roadway.
 - US-52: 12 feet wide lanes, one lane in each direction, and two-foot shoulders on both sides of the roadway.
 - KY-292: 10 feet wide lanes, one lane in each direction, and no shoulders on both sides of the roadway.
 - N Wolf Creek Road (KY-1714): 12 feet wide lanes, one lane in each direction, and no shoulders on both sides of the roadway.
 - S Wolf Creek Road (KY-1439): 12 feet wide lanes, one lane in each direction, and no shoulders on both sides of the roadway.
- c. **Road Permits** - The project acknowledges that an oversized transportation permit may be required from the Kentucky Transportation Cabinet. No other applicable permits were identified for the use of these roads.

Response Provided by: Ellen Mullins

9. Provide any geotechnical reports that have been completed for the proposed transmission line route.
- RESPONSE:** Geotechnical exploration for transmission structure sites located outside of the solar generation facility will be conducted once the Project has completed 30% design of the transmission line. Geotechnical exploration was completed within the footprint of the solar generation facility, which is traversed by approximately 1.2 miles of the transmission line. The final report is included as **Attachment A**.

Response Provided by: Eddie Barry & Christina Martens

10. Provide any communication that has occurred with American Electric Power (AEP) regarding the Project, including copies of any agreements that have been executed or are being negotiated.

RESPONSE: Communications with AEP regarding the Project to date have been conducted in recurring monthly meetings that center around design, schedule and budget. The project entered into a Generator Interconnection Agreement with Kentucky Power Company in January 2025, which is provided as **Attachment B** to these responses. The Project has not executed and is not currently negotiating any other agreements with AEP or Kentucky Power.

Response Provided by: Eddie Barry

11. Provide additional information regarding Attachment B, Figure No. A-3, Segment Network which was included in Lynn Bark Energy's response to the Siting Board Staff's First Request for Information. Specifically:

- a. Identify which of the numbered transmission line segments shown in Figure No. A-3 are included in the selected route for the transmission line.
- b. It appears the selected route may include one or more sections not shown in Figure No. A-3. If so, please produce a revised version of Figure No. A-3 that also includes all segments of the selected route.
- c. Provide further information regarding how the chosen route was selected from among the alternatives. Explain whether a formal scoring or ranking process was involved. If so, please describe the factors that were considered and how those factors were weighed in making the final route selection

RESPONSE: Attachment B, Figure No. A-3 from DR1, has been updated to show the final chosen route overlaid on the Segment Network map as seen on **Attachment C**.

- a. Transmission line segments 1, 2, the end of 5, the very beginning of 7, 9, and portions of 14 are used in the final route.
- b. **Attachment C** shows the final route overlaid on the Segment Network study map. Although the final route does not follow exactly one of the routes identified within the routing Segment

Network map, all segments of the final route do fall within the study area that was used for the routing segment study.

- c. Once the routing segment study was completed, the alternates were reviewed and the work began to secure leases for the easement. The final route was chosen based on recommended routes and landowner willingness. The final route chosen is almost entirely on previously mined property owned by Pocahontas and its affiliates, eliminating the need to cross all but one individually owned parcel.

The segment network study did provide a ranking based on the review of environmental, cultural, social, land use, and engineering impacts and requirements. The final route does not have any additional environmental, social, or land use impacts than any of the other identified routes. In fact, from a landowner perspective there is less impact on current and future land use due to the previous land use and the current ownership.

Response Provided by: Christina Martens & Ellen Mullins

12. Provide any sketches of the proposed transmission line structures.

RESPONSE: Lynn Bark has not yet selected the structures or specific design it intends to use for the transmission line. In Lynn Bark's response to DR1, it provided Attachment H, which included figures of typical electrical transmission structures. Lynn Bark anticipates using one or multiple of the structures depicted in that attachment.

Response Provided by: Christina Martens

13. Confirm that the proposed transmission line will comply with American Society for Testing and Materials (ASTM) and American Society of Civil Engineers (ASCE) standards. If not confirmed, explain why not.

RESPONSE: The proposed transmission line will comply with the relevant ASTM and ASCE standards along with the IEEE National Electrical Safety Code and applicable utility standards.

Response Provided by: Eddie Barry

14. Identify the entity that will be responsible for maintaining vegetative clearing for the right-of-way (ROW) for the life of the project.

RESPONSE: The Applicant, Lynn Bark Energy Center, LLC, will be responsible for maintaining vegetative clearing of the right-of-way for the life of the project.

Response Provided by: Eddie Barry

15. Provide any vegetation management plan for the proposed transmission line route.

RESPONSE: The Project will create and implement a vegetation management plan prior to commencing clearing activities in the transmission line right-of-way. The vegetation management plan will entail a combination of selective tree removal, brush removal, mowing, hand-cutting, herbicide treatments, restoration and revegetation of disturbed areas and routine inspections to identify encroachments or potential hazards. Periodic maintenance cycles will be performed at intervals determined based on vegetation growth rates. The Project will be responsible for maintaining vegetation within the right-of-way corridor through the operating life of the transmission line.

Response Provided by: Eddie Barry

16. Provide any communication that has occurred with the Kentucky Transportation Cabinet and the Martin County Road Department regarding the proposed transmission line.

RESPONSE: To date, there has been no direct communication with the Kentucky Transportation Cabinet or the Martin County Road Department regarding the construction of this transmission line. As the project moves towards construction, those discussions will begin for any permitting or coordination that is needed.

Response Provided by: Christina Martens

17. Provide a map showing the proposed transmission line route and all existing transmission lines, with the owner(s) of the lines identified, that cross the proposed line or fall within 2,000 feet of the proposed ROW.

RESPONSE: As previously provided in Table 3 in Lynn Bark's response to Request 56 of DR1, all existing transmission lines identified to be crossing the proposed line or falling within 2,000 feet of the proposed ROW are owned by Kentucky Power Company (owned and operated by AEP). Lynn Bark has updated the map it provided as Attachment K to DR1 to include the ownership of each line, which is attached to these responses at **Attachment D**.

Response Provided by: Ellen Mullins

18. Provide a map showing all proposed access points to the proposed transmission line route.

RESPONSE: This information was previously provided by Lynn Bark as Attachment L in its responses to DR1.

Response Provided by: Eddie Barry

19. Explain whether the entire proposed ROW route will be cleared of vegetation prior to any construction or if it will be cleared while the line is constructed.

RESPONSE: Portions of the ROW will be cleared of vegetation in advance of construction activities to allow for safe access and work area preparation. It is expected that ROW clearing will occur in a phased manner, such that while transmission line construction is underway in previously cleared sections, vegetation clearing activities will continue in other portions of the ROW to prepare those areas for subsequent construction.

Response Provided by: Eddie Barry

20. Provide all communication that has occurred with owners of transmission lines that cross or fall within the proposed transmission line ROW.

RESPONSE: Communications with Kentucky Power Co. (AEP) regarding transmission line and infrastructure crossings and encroachments are ongoing through recurring monthly meetings. As shown on **Attachment D**, the preferred transmission line route is expected to cross one AEP-owned 69kV transmission line, and the transmission line right-of-way is expected to encroach on the AEP-owned 69kV MapCo substation. AEP has provided initial guidance regarding the requirements for

entering into the necessary crossing agreements and effectuating the related easements, which the Project is evaluating.

Response Provided by: Eddie Barry

21. Explain whether vegetative clearing will be required for access to the proposed transmission line.

RESPONSE: Vegetation clearing may be required to create access roads to certain structure locations.

Response Provided by: Eddie Barry

22. Provide the distances between the poles along the ROW.

RESPONSE: As indicated in Lynn Bark's response to Request 27 of DR1, a final design has not yet been completed. The project will include at least 50 to 60 structures across 6.27 miles, and Lynn Bark anticipates potential distances between the poles spanning anywhere from 600-1500 feet depending on topographical and geotechnical considerations.

Response Provided by: Eddie Barry

23. Provide the height(s) of the poles.

RESPONSE: As indicated in Lynn Bark's response to DR1, Request 27, a final design has not yet been completed. However, Lynn Bark anticipates that the project will include at least 50 to 60 structures ranging from 60 to 100 feet in height.

Response Provided by: Eddie Barry

24. Explain whether the proposed route is the final route or could it be potentially adjusted.

RESPONSE: Lynn Bark expects that the preferred route depicted in **Attachment C** will be the final route for the transmission line. As explained in Lynn Bark's response to Request 11, this route was selected after an in-depth analysis of environmental, cultural, social, land use, and engineering impacts, and landowner willingness, and represents the most advantageous path considering each of these factors. However, due to the early stage of the project and the fact that environmental, geotechnical, engineering, and constructability due diligence is ongoing, there is the potential that

Lynn Bark may determine another route is preferable. If that situation arises, Lynn Bark will follow the required procedures to promptly inform the Board and, if needed, amend its application or certificate.

Response Provided by: Eddie Barry

25. Explain who is responsible for the interconnection costs.

RESPONSE: Per the terms of the Generator Interconnection Agreement, Lynn Bark Energy Center, LLC, is responsible for all costs associated with the interconnection of the generating facility.

Response Provided by: Eddie Barry

26. Provide the distance for each transmission line to the closest residence.

RESPONSE: As provided in Table 1 of the Data Request 1 response, the closest residence to the transmission line is 3490 South Wolf Creek in parcel 040-00-00-033.00. This is the closest residence to both the Preferred and Alternative routes and is located 321 linear feet from the closest ROW and 396 linear feet from the proposed transmission line.

Response Provided by: Ellen Mullins

27. Explain what entity owns and maintains the transmission system in the area.

RESPONSE: Kentucky Power Co. (owned and operated by AEP).

Response Provided by: Christina Martens

28. Explain which entity is the regional transmission organization footprint for this project.

RESPONSE: PJM Interconnection, LLC

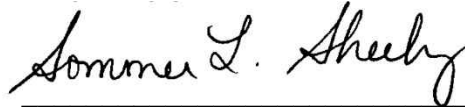
Response Provided by: Christina Martens

29. Provide any interconnection studies or reports that have not been provided to the Siting Board.

RESPONSE: The PJM Facilities Study Report dated September 2024 is provided as **Attachment E**.

Response Provided by: Christina Martens

Respectfully submitted,

A handwritten signature in black ink that reads "Sommer L. Sheely". The signature is written in a cursive style with a horizontal line underneath it.

Sommer L. Sheely

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