

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF TURKEY	)	
CREEK SOLAR, LLC FOR A CONSTRUCTION	)	
CERTIFICATE TO CONSTRUCT AN	)	
APPROXIMATELY 50 MEGAWATT	)	CASE NO.
MERCHANT ELECTRIC SOLAR GENERATING	)	2020-00040
FACILITY IN GARRARD COUNTY, KENTUCKY	)	
PURSUANT TO KRS 278.700 AND 807 KAR	)	
5:110	)	

SITING BOARD STAFF'S SUPPLEMENTAL REQUEST FOR INFORMATION  
TO TURKEY CREEK SOLAR, LLC

Turkey Creek Solar, LLC (Turkey Creek), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on July 20, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> issued March 16, 2020, and March 24, 2020, Turkey Creek SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Turkey Creek shall make timely amendment to any prior response if Turkey Creek obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Turkey Creek fails or refuses to furnish all or part of the requested information, Turkey Creek shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Turkey Creek shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. The property for the proposed solar project is served by two electric distribution utilities: Kentucky Utilities Company (KU) in the northern part of the site and Inter-County Energy Cooperative (Inter-County) for the majority of the acreage. See the boundary on the web by following these instructions:

- Go to: <https://kygeonet.ky.gov/govmaps/>
- Scroll down to "Featured Web Maps" and click on "Electric Service Areas"

- Fill in the address “1928 Crab Orchard Rd, Lancaster, KY, 40444” in the space labeled “Find address or place” and click on the search button. Use the – button to zoom out to cover most of the project site.
- Some suggestions: Change the Basemap to “Imagery Hybrid”. Under “Contents” the layers can be clicked on and off.

a. State whether Turkey Creek has been approached by any of these electric distribution utilities about supplying electric power to the site during the construction or operation phase. If so, please describe the interaction.

b. State whether the proposed solar facility will need to have electricity supplied to both electric territories during the construction or operation phase. State whether the electricity will be provided by both KU and Inter-County to serve the proposed solar facility that is located in their respective service territory.

c. State whether Turkey Creek intends to use one electric supplier and have the chosen utility file an electric territory boundary change with the Public Service Commission.

2. There is an interstate gas transmission pipeline that crosses the project site.

See the pipeline on the web by following these instructions:

- Go to the National Pipeline Mapping System at <https://www.npms.phmsa.dot.gov/>
- Click on “Use Public Map Viewer” and then choose Kentucky and Garrard County.
- Press the Zoom (+) button once, and then focus on the pipeline that runs between route 27 and 39. Reposition the image by holding down the mouse button and moving the pointer.
- Use the identify (blue i) button to click on the pipeline to find the following information: Tennessee Gas

Pipeline Company, pipeline 800-1, active with natural gas as of 3/12/2019 and the contact information for the Public Awareness Coordinator at (800) 276-9927, email: PUBLICAWARENESS@KINDERMORGAN.COM, 1001 Louisiana Street Suite1000, Houston, TX 77002.

- a. State whether Turkey Creek has contacted Kindermorgan / Tennessee Gas Pipeline Company regarding this pipeline. Describe all contacts with this company.
  - b. Does Turkey Creek have a copy of the right of way easement for the pipeline? If so, provide a copy of the easement.
  - c. Revise the site map ([Exhibit A2 Turkey Creek Siting Layout - 12.09 - reduced.pdf \(01285415xA9D25\).pdf](#)) to show the right of way easement for the pipeline as well as easements for the KU and EKPC transmission lines.
  - d. State whether the location of the pipeline will have any impact on the location of the solar panels. If so, show the revision on the site map as well.
  - e. State whether Kindermorgan has any stipulations about the access roads that will cross the pipeline. State whether there is a vehicular weight or frequency limit either from Kindermorgan or the U.S. Department of Transportation's Pipeline and Hazardous Materials Administration regarding use of any access roads that will cross the pipeline.
  - f. State whether Turkey Creek has any arrangements to work with Kindermorgan during project construction.
  - g. If known, state whether Kindermorgan has any plans to replace the existing pipeline or expand the right of way to accommodate an additional pipeline.
3. Refer to the Notice of Transfer filed on June 12, 2020.

a. State whether Silicone Ranch Corporation has a good environmental compliance history and provide all supporting information for establishing good environmental compliance history.

b. State whether Silicone Ranch Corporation has the financial, technical, and managerial capacity to meet any obligations imposed by the terms of any approval or has the ability to contract to meet those potential obligations.

4. Refer to Attachment A of the application, Volume II, Property Value Impact Report, page 2, regarding the statement that the nearest residential property is located 240 feet from the proposed solar facility. Refer also to Attachment C of the application, Volume II, Noise and Traffic Study, page 2, which states that the dwelling nearest to any proposed solar structure is located approximately 400 feet from the nearest solar panel. Lastly, refer to the motion for deviation, Exhibit 1, which shows that the closest residence (located in Merriwood Estates) to the solar facility is 300 feet. Reconcile the difference in these three statements regarding the closest residential property to the solar facility.



Kent A. Chandler  
Executive Director  
Public Service Commission *on behalf*  
*of the Kentucky State Board on*  
*Generation and Transmission Siting*  
P.O. Box 615  
Frankfort, KY 40602

DATED  JUL 01 2020

cc: Parties of Record

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