

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF GLOVER)	
CREEK SOLAR, LLC FOR A CONSTRUCTION)	
CERTIFICATE TO CONSTRUCT AN)	
APPROXIMATELY 55 MEGAWATT)	CASE NO.
MERCHANT ELECTRIC SOLAR)	2020-00043
GENERATING FACILITY IN METCALFE)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO GLOVER CREEK SOLAR, LLC

Glover Creek Solar, LLC (Glover 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 29, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Glover 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

¹ 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.

Glover Creek shall make timely amendment to any prior response if Glover 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 Glover Creek fails or refuses to furnish all or part of the requested information, Glover 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, Glover 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. Refer to Turkey Creek's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 2.

a. Regarding the three leases referenced in the response to Item 2.a., provide a copy of each of these leases.

b. Regarding the type of solar panel to be used as mentioned in the response to Item 2.b., state when a decision will be made with respect to using either

monocrystalline or polycrystalline panels, and state whether the type of panel technology will impact decommissioning and eventual disposal options.

c. Regarding the shrubs as referenced in the response to Item 2.c., state the potential maximum height of the shrubs once fully matured.

2. Refer to Turkey Creek's response to Staff's First Request, Item 4.a. Explain why there were two separate interconnection queue submittals to PJM Interconnection, LLC for this solar development rather than one submittal for the entirety of the project, and state whether the interconnection will require two separate phases.

3. Refer to Turkey Creek's response to Staff's First Request, Item 5. Explain why the Regenerative Energy method is not being implemented for this particular project.

4. Refer to Turkey Creek's Motion for Deviation from Setback Requirements, Exhibit 2, Garrard County Board of Education Letter of Support. Explain in more detail the solar project-related payments that will be made to Garrard County in connection with the issuance of the industrial revenue bonds associated with the solar project.

5. Refer to the questions propounded by Harvey Economics, which are attached as an Appendix to this information request, and provide responses to those questions.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JUN 12 2020

cc: Parties of Record

APPENDIX

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY STATE
BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING IN CASE
NO. 2020-00043 DATED JUN 12 2020

[FOUR PAGES TO FOLLOW]

SECOND SET OF INQUIRIES ABOUT THE GLOVER CREEK SOLAR LLC APPLICATION FOR A CONSTRUCTION CERTIFICATE

This second set of questions pursuant to Harvey Economics' (HE) review of the Site Assessment Report (SAR) for the Glover Creek Solar facility was prepared as a follow-up to the responses provided by Glover Creek Solar, LLC to the initial set of questions submitted on May 14, 2020 (RFI#1) and received on June 1, 2020. HE requests that responses to these questions be provided in writing, supplemented by attachments as needed. HE will clarify any questions which are unclear to the Applicant. HE will review the Applicant responses and seek a follow-up discussion confirming our understanding with the appropriate Glover Creek/Carolina Solar personnel as needed.

I Construction phase activities –

The detailed schedule provided is very helpful in understanding construction phase activities. Here are some follow-up questions:

- A. How many workers will be on site at any one time by task?
- B. What is average and peak number of workers you will have on site each month during construction?
- C. From the provided schedule, it appears that the peak period of activity might be the five-week period including July and early August 2022. Confirm if this is correct.

II Site development plan –

- A. *Location of the construction staging area* – the response to the RFI #1 states that the construction staging area will be located near one of the two construction entrances. Which entrance should we assume for the purposes of the impact evaluation and the SAR review? Is a staging area off the entrance from SR 90 more likely since that is a more of a “main” road, as compared to SR 640?
- B. *Number of residences by distance from site boundaries and panels*—RFI#1 provided more information about the site boundaries and surrounding area, but it is still unclear what the distance is between each of the nearby residences, the site boundary and the nearest solar panel. A table would help for residences, moving outward to 1,000 feet, i.e., number of residences within 100 feet from boundary, number within 100 feet from nearest panel, number of residences within 200 feet from boundary, number within 200 feet from nearest panel, etc.
- C. *Location of transformers/ inverters/ ESS* – the response to RFI #1 indicates that the final locations of those facilities has not been determined, but that they will be at least 150 feet from the property boundary. The POND report states that the inverters will be located at least 2,000 feet from any homes. Does this mean that the nearest home to the property boundary is 1,850 feet? Please confirm those distances or resolve the differences. Does

the site layout graphic provided in Exhibit D of RFI #1 provide a likely representation of those locations?

- D. *Possible panels on the northeastern most parcel* – the response to RFI #1 suggests that panels may be located within that parcel. The impact evaluation must assume that panels are in that parcel or not. If this cannot be determined now, we will assume solar panels will be located in that area. Assuming panels will be located in that parcel, how far would those panels be from the nearest home? It appears that there is a residence off Eddie Harbinson Road that would be at a close distance. The Kirkland report does not indicate the distance between that home and panels. Please provide that distance.
- E. *Construction access*--Will all three construction access points (from SR 90, SR 640 and Big Jack Road) be gated and locked at night and on weekends when no construction activities will take place?
- F. *Operations access*--Please confirm that the locked access gate in place during operations would be located on Big Jack Road near the substation, or provide correct the correct location of the access gate.
- G. *Power source*--Will any power from the Summer Shade – Patton Rd Jct 69kv transmission line be required during construction or operation? If not, what will be the power source on site during construction and operation?
- H. *Two project phases?*—In the discussion of transmission, two phases of the project were mentioned. Please clarify or elaborate.
- I. *Legal site boundary* – The response to RFI #1 indicates a total project site of about 560 acres (that acreage is also shown on page 129 of the SAR as part of the description of the legal boundaries of the proposed site). However, upon further inspection, it appears that one section of the project site as shown in the site plan layout on page 316 of the SAR is NOT included in that legal project boundary. It appears that the portion of the project site directly east of the preliminary substation location and east of Big Jack Road (with a zig zag edge on its east side) is not included in the legal project description. Please confirm if this is correct. If so, please provide a revised legal boundary description, including map, along with the full and complete calculation of the acreage of the proposed site.

III Property values and land use –

- A. *Construction activities* - The response from Rich Kirkland in RFI #1 does not include any research or analysis regarding the topic of potential changes in property values due to construction activities, but it indicates that he does not believe there would be any impact during that period. Please substantiate that opinion or confirm that there is no additional support for that position.

IV Traffic –

- A. According to responses from RFI #1, during the peak period, there would be 75 commuting worker vehicles (Class 2 and 3) traveling to and from the site per day and 15 Class 9 vehicles traveling to and from the site per day. Is that correct?
- B. How many Class 21 truck trips will be needed for the delivery of the substation transformer? When will that occur in the construction schedule and over how many days?
- C. How many other Class 21 truck trips will be required to deliver equipment to the site? When will those trips occur?
- D. What is the expected weight of the Class 9 vehicles (including cargo)?

V Dust –

- A. The cumulative environmental assessment lists best management practices (BMPs) as the primary way of minimizing air impacts. Covered loads and watering down roads are listed as examples of best management practices. The POND report lists revegetation measures as an additional mitigation technique. Is the project committed to following BMPs for dust control and noise during construction?

VI Noise –

- A. Construction phase
 - 1. How loud is the equipment use to “push” the racking systems into the ground?
 - 2. What is the frequency of “push” equipment use?
- B. Operational phase –
 - 1. *Distance of solar panel motors to boundaries*—Please provide the distance from the nearest solar panel motor to the site boundary. Will that be typical for the solar panel motors around the perimeter of the solar project?
 - 2. How far will the solar panel motors be spaced from one another?

VII Topography/ Scenery –

- A. The response to RFI #1 included information on glare studies (Exhibit M). We would like to discuss that information with the Applicant or the consultant via a telephone conference to be scheduled in the immediate future to make sure we understand the work that was done and the results.
- B. Will anti-glare panels be used in this Project?

VIII Economic impact analysis –

- A. The response to RFI #1 indicates that a report from the Bureau of Economic Analysis (BEA) was included as Exhibit M. However, Exhibit M is the glare information and the BEA report is missing from the response package. Please provide the cited BEA report.
- B. Were the Metcalfe County multipliers from the BEA used in the economic impact analysis? Footnote 3 of Exhibit G states that a multiplier of 1.5 was used, based on a report from New Mexico State University.
- C. The response to RFI #1 suggests that the majority of the economic benefits to Kentucky are related to employment and wages during the construction period. However, RFI #1 states the bulk of workers will come from the existing local labor force. Please explain how this is a benefit.
- D. Can you tell us the total number of construction person-hours for the project?
- E. The economic impact analysis assumes 300 direct construction jobs; however, the response to RFI #1 indicated an average of 50 worker vehicles commuting to the site each day. If most of the construction workers are hired from the local labor force, carpooling is likely to be minimal. Please explain the apparent contradiction in the construction job and worker commuting vehicles.
- F. Under the heading Fiscal Impact: Operational Phase, the economic impact analysis states that the “Project will pay approximately \$1 million in county property taxes over the first twenty years of operation, with on-going county tax payment continuing after the first twenty year.” However, the response to RFI #1 discusses an approval from the Metcalfe County Fiscal Court with regard to an Industrial Revenue Bond and payments to Metcalfe County in lieu of property taxes. Please explain the agreement between the Applicant and Metcalfe County as it relates to property tax payments or other fiscal effects on the local jurisdictions.

IX Decommissioning –

- A. RFI #1 indicated that in the leases for certain lands, there was a commitment for decommissioning. Please provide a copy of those leases.
- B. If the prices of metals (aluminum, copper, steel) or the costs of decommissioning 40 years from now are such that it costs more to remove materials than is returned by salvaging them, what is the guarantee that full decommissioning would occur, including all facility materials removed from the site and the site restored?

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