

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF)	
HORSESHOE BEND SOLAR, LLC FOR A)	
CERTIFICATE OF CONSTRUCTION FOR AN)	
APPROXIMATELY 60 MEGAWATT)	CASE NO.
MERCHANT ELECTRIC SOLAR)	2020-00190
GENERATING FACILITY IN GREEN COUNTY,)	
KENTUCKY PURSUANT TO KRS 278.700)	
AND 807 KAR 5:110)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
TO HORSESHOE BEND SOLAR, LLC

Horseshoe Bend Solar, LLC (Horseshoe Bend), pursuant to 807 KAR 5:001, is to file with the Siting Board an electronic version of the following information. The information requested herein is due on February 12, 2021. The Siting Board directs Horseshoe Bend to the March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Siting Board. The Siting Board expects the original documents to be filed 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.

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.

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 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.

Horseshoe Bend shall make timely amendment to any prior response if Horseshoe Bend obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Horseshoe Bend fails or refuses to furnish all or part of the requested information, Horseshoe Bend 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, Horseshoe Bend 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 the Application, Volume I, Executive Summary.
 - a. Regarding the six leases executed by Horseshoe Bend, provide a copy of each of these six leases.

b. Regarding the long-term power purchase agreement, identify the company that could potentially acquire the output from the proposed solar facility.

2. Refer to the Application, Volume I, Executive Summary. Explain whether the project has entered into or is in negotiation for a long-term power purchase agreement with any company.

3. Refer to the Application, Volume I, Section 2. Description of Proposed Site.

a. Regarding the community feedback concerning the frequency of signage along the security fence as being unsightly, explain how Horseshoe Bend will address this feedback.

b. Regarding the type of inverters to be used, explain Horseshoe Bend's decision-making process in evaluating what type of inverter will be selected for the proposed solar facility. If string inverters are selected, identify how many string inverters will be needed for the proposed solar facility.

4. Refer to the Application, Volume I, Section 3. Public Notice Evidence.

a. State how many landowners own property that adjoins the proposed solar facility site.

b. Identify any adjoining property owner that did not receive the December 7, 2020 letters. For those property owners that did not receive the letters, provide any follow-up measures performed by Horseshoe Bend to provide these owners with notice.

c. State whether any of these adjoining property owners provided feedback regarding the proposed solar facility site. If so, state how Horseshoe Bend responded to those feedback.

d. Submit a map that shows the project boundary and all adjacent parcels with a key to a list of the adjacent property owners.

5. Refer to the Application, Volume I, Section 6, Public Notice Report. State whether there was any feedback received from the public meeting that was conducted. If so, state how Horseshoe Bend responded to those feedback.

6. Refer to the Application, Volume I, Attachment I, page 3.

a. Explain how the IMPLAN model was tailored to Green County.

b. Explain why the IMPLAN model was tailored to only Green County and did not include surrounding counties.

c. Explain whether the direct economic effects during the construction phase of the project would not include labor being drawn from surrounding counties, if not contiguous counties.

7. Refer to the Application, Volume I, Attachment I, page 4.

a. Explain whether the 186 new jobs in the county are temporary and inclusive of the estimated 150 workers required to construct the project.

b. If the jobs are temporary, explain how long they are estimated to last.

8. Refer to the Application, Volume I, Attachment I, page 5. Explain whether the Payment in Lieu of Taxes agreement is supportive of or creates any jobs.

9. Refer to the project boundaries on the maps in Application, Volume II, Site Assessment Report.

a. Refer to the map in Attachment A – Preliminary Project Layout. State whether this is the final project boundary before the Siting Board.

b. Refer to the map in Attachment B – Property Value Impact Report, page 4. The parcels outlined in yellow appear to be project boundaries. There are discrepancies along the southeastern part of the map compared to the map in Attachment A. Explain the discrepancies.

c. Refer to the map in Attachment E – Boundary Survey and Legal Descriptions. There are discrepancies along the southeastern part of the map compared to the map in Attachment A. Explain the discrepancies.

d. The maps in Attachment H – Phase 1 Environmental Site Assessment, Figure 1, Figure 2, and Key Map – 5946033.10s, have a project boundary that excludes an area to the west of Jim Meadows Road and an area bordering Route 218. Explain the discrepancy from Attachment A and how this affects the results of the environmental assessment.

10. Refer to the Application, Volume II, Site Assessment Report, Attachment F –The Noise and Traffic Study, as it notes that construction will take 8 to 12 months and will produce an increase in traffic from construction workers and delivery of equipment and material. In Attachment F, Horseshoe Bend provides the number of vehicle trips during construction and advises of the anticipated number of workers, both the average and peak. However, additional details are needed regarding the workers as it relates to increased traffic. Please provide the following answers regarding the workers to the requests for information below.

a. Please provide an approximate percentage breakdown of where the construction workers will commute from each day, if possible.

b. State whether all workers are anticipated to commute from their homes daily, or whether there will be any anticipated temporary housing that will be developed on-site.

c. If construction workers use Liletown Road to access the Jim Meadows Road entrances to the project site, estimate how many would use Liletown Road.

11. In Attachment F, Horseshoe Bend advises that the weight of the Class 9 trucks will be 40,000 pounds each. Provide details on the heaviest vehicle to be used during construction, and state the expected maximum weight of the largest vehicles (including any materials or equipment that the truck is hauling).

12. If possible, provide an approximate breakdown by point of origin for the construction truck traffic.

13. State whether the construction crew members, supervisors, and others will park on-site.

14. Regarding the fugitive dust impact, Horseshoe Bend advises that state and local area roadways are paved, but fugitive dust is anticipated during construction from land disturbance and use of unpaved driveways. Beyond what is provided in Attachment F, additional information is needed. Provide answers to the questions below.

a. State whether there are any plans for paving (or putting down gravel) for the driveways associated with the project.

b. Although Horseshoe Bend states it will construct internal gravel roadways, state whether there are any improvement plans for the existing roads.

c. Although Horseshoe Bend states water may be applied to control dust, provide the protocol or frequency of spraying down dirt roads or applying water.

d. State whether the site will need to be irrigated to promote vegetation.

15. Refer to the Application, Volume II, Site Assessment Report, Attachment G Cemetery Report. State whether Horseshoe Bend has conducted further investigation to determine whether any requirements of Section 106 of the National Historic Preservation Act will be triggered by the construction of the proposed solar facility site.



Linda C. Bridwell, PE
Executive Director
Public Service Commission *on behalf*
of the Kentucky State Board on
Generation and Transmission Siting
P.O. Box 615
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DATED JAN 27 2021

cc: Parties of Record

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