

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 POST-HEARING 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 May 14, 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 with the Commission 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. Regarding the local, state, and federal permitting requirements, including those required by the U.S. Corps of Engineers, for impacts to water bodies, provide additional information regarding these permitting requirements and the steps that will be taken by Horseshoe Bend to comply with these requirements.

2. Provide a copy of the property value impact studies performed by the University of Texas at Austin (2018) and the University of Rhode Island (2020) as relied by Kirkland Appraisals in Horseshoe Bend's response to the Wells Engineering Final Report.

3. Identify the amount of time it will take for the pile driving process to install racking columns at a distance of 150 feet.

4. Identify any product(s) or means of construction that would be able to reduce or limit noise during the construction process, particularly during the pile driving portion of the construction process, and provide the approximate cost of each such product or means of construction.



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 APR 23 2021

cc: Parties of Record

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