COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF NORTHERN BOBWHITE SOLAR LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 96 MEGAWATT MERCHANT SOLAR ELECTRICGENERATING FACILITY IN MARION COUNTY, KENTUCKY PURSUANT TO KRS 278.700 AND 807 KAR 5:110

CASE NO. 2020-00208

)

)

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION TO NORTHERN BOBWHITE SOLAR, LLC

Northern Bobwhite Solar, LLC (Northern Bobwhite), 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 15, 2021. The Siting Board directs Northern Bobwhite 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.

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.

Northern Bobwhite shall make timely amendment to any prior response if Northern Bobwhite 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 Northern Bobwhite fails or refuses to furnish all or part of the requested information, Northern Bobwhite 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, Northern Bobwhite 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, Exhibit D.4 – Open House for Public Information Meeting. On the second slide under the heading "Available for Review at Meeting" column, provide a copy of the referenced NCSU Clean Energy Technology Center Research on Health & Safety of Solar Photovoltaics and NCSU Clean Energy Technology Center Research on Balancing Agriculture with Solar Development.

-2-

 Refer to the Application, Exhibit D.5 – Presentation for Public Information Meeting.

a. On the slide entitled "Solar: A Proven & Environmentally Safe Technology," provide support for the statements made on this slide and state whether such statements are applicable to the proposed Northern Bobwhite solar facility.

b. On the slide entitled "Decommissioning Plan," identify the number of landowner agreements entered into by Northern Bobwhite for the proposed solar facility and provide a copy of each of those agreements. Also, explain whether those agreements contain any provision(s) setting forth Northern Bobwhite's obligations with respect to the decommissioning of the proposed solar facility.

Refer to the Application, Exhibit O – Site Assessment Report, page 3, and
Appendix C – Site Plans, regarding the pipeline right-of-way.

a. State the width of the legal right-of-way.

b. State the owner of the right-of-way.

c. State if the pipeline is operational and what liquid or gas it carries.

d. Describe how the constraint "50 feet from Pipeline" conforms to the legal right-of-way.

e. Refer to Appendix C – Site Plans, Map page 1 of 4, confirm that the internal access road and the access road point cross the pipeline.

f. Refer to Appendix C – Site Plans, Map page 3 of 4, confirm that the internal access roads cross the pipeline in three places.

g. Describe any discussion with the owner of the pipeline or any relevant regulatory agencies regarding the internal road crossings.

-3-

h. Describe how the tamping process during construction might affect the pipeline.

4. Refer to the Application, Exhibit O – Site Assessment Report, page 4, regarding the southwest part of the project area that is in the electric service territory of Kentucky Utilities Company. Discuss the sentence "When electricity is needed at night for the Project, it will be provided via the transmission level connection with potential billing through Inter County Energy Cooperative."

a. State whether this is regarding construction or operation or both.

b. State whether there has been any agreement or discussion with Kentucky Utilities Company regarding potential billing through Inter County Energy Cooperative.

5. Refer to the Application, Exhibit O – Site Assessment Report, Appendix C – Site Plans. Regarding the Site Plan Overview map, which depicts the project site divided into four map pages, there is an area on this map that is yellow in color with has lines indicating "Collection Easement Parcels." Explain what is meant by the term "Collection Easement Parcels" and how this area functions in relation to the proposed solar facility footprint.

6. Refer to the Application, Exhibit O – Site Assessment Report, Appendix E – The Traffic Assessment, which notes that construction will take approximately 12–18 months and will produce an increase in traffic from construction workers and delivery of equipment and material. The Traffic Assessment provides a chart of the number of vehicle trips during construction, but does not provide all necessary information regarding

-4-

the anticipated workers. Please provide the following answers regarding the workers to the requests for information below.

a. The number of anticipated workers is provided, but please indicate the average and peak numbers of anticipated workers.

b. Identify where the construction crew, supervisors, and others will park on-site.

c. Regarding impact on road infrastructure, state whether there are any plans for paving (or putting down gravel) for roads associated with the project.

d. In addition to constructing access drives and internal roads to accommodate appropriate vehicles and equipment, state whether there will be any improvement plans for the existing roads used to access the site.

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

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 Frankfort, KY 40602

DATED FEB 01 2021

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. 2020-00208 DATED FEB 01 2021

FIFTEEN PAGES TO FOLLOW

FIRST SET OF INQUIRIES ABOUT THE NORTHERN BOBWHITE SOLAR, LLC APPLICATION FOR A CONSTRUCTION CERTIFICATE

The following set of questions are pursuant to our review of the Site Assessment Report (SAR) provided by Northern Bobwhite Solar, LLC (Applicant) as part of the application submitted to the Kentucky State Board of Electric Generation and Transmission under KRS 278.706. Harvey Economics (HE) has been retained by the Kentucky Public Service Commission to perform the review and evaluation of the SAR. These questions are intended to gain a more complete understanding or clarification of the materials provided about the proposed Northern Bobwhite Solar Project, to be located in Marion County, KY, north of the City of Lebanon, and to request information that was not found in the Application. 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. Along with Staff, HE will review the Applicant responses and seek a follow-up discussion confirming our understanding with the appropriate Northern Bobwhite Solar personnel as needed.

- I Construction phase activities—Generally, much more information was provided about the operational phase compared with the construction phase. Since impacts will occur during the construction phase, HE is requesting more information about construction, summarized below and detailed in subsequent inquiry categories.
 - A. Please provide a detailed description of construction activities, including a schedule and description of activities, peak activity periods, number of commuting workers (average by quarter and peak period), personal and construction vehicle traffic volumes (see detailed question below), construction access points to the site and staging area, local roads, State Routes and highways that will carry construction traffic.
 - B. The Project appears to consist of parcels dispersed among several different geographics areas. Will all parcels within the Project boundaries be developed simultaneously, or will parcels be developed subsequent to one another in some sequence? If yes, please provide a description of that sequence over the construction period.

II Site development plan—We need to better understand certain elements of the site development plan.

- A. On the Exhibit A 1.0 Permitting Context Map, it appears that there are a small number of residential structures located within the Project boundary (these are also shown on the various Site Plan maps in Appendix C of Exhibit O). Please explain the relationship between those residences and the Project.
 - 1. Are those structures currently occupied?

- 2. If so, will Northern Bobwhite have them vacated prior to the start of construction?
- 3. If they are to remain occupied during construction and operations, how far are those structures from the solar panels or other equipment?
- B. Section 1 of the SAR (Exhibit O) lists items that will not materially change during the final design without approval from the Board (specific setbacks). The text in that section also indicates that the Site Plan provided in Appendix C is preliminary and that the location of items such as the interior access roads, construction entrances and solar equipment is not final.
 - 1. For the purposes of evaluating impacts to traffic, noise, visual aesthetics and property values, we must rely on specific numbers and locations for those items. For that effort, should we assume the preliminary locations presented in Appendix C are the best information available? Also, please ensure that we have your best available estimate of numbers of specific components, i.e. solar panels, inverters, etc.
- C. Section 1.4 of the SAR (Exhibit O) lists 8 different constraints and setbacks, including: f) Non-Participating Property (50 ft to solar installations) and g) Residence (200 ft setback to solar installation).
 - 1. What is the definition of a "non-participating property"?
 - 2. Is the setback noted in this section for a "non-participating" property a minimum 50 feet from that property <u>boundary</u> to a solar panel? If not, please clarify.
 - 3. Is the 200 ft setback between "Residence and solar installation", the minimum distance between the home and the nearest solar panel? If not, please clarify.
- D. Site Plans (Appendix C of Exhibit O):
 - 1. The 4 pages of the Site Plan Map indicate nine potential access road points into different areas of the Project Boundary.
 - a. Will all of those access points actually be utilized during construction?
 - i. If not, please indicate which access will be used or will primarily be used.
 - ii. If yes, what assumptions should be made about the utilization of access points for facility components, construction equipment and construction workers?

- b. Will the total number of final access points be limited during operations and if so, which access points will remain?
- c. Please confirm the locations of the access road points by indicating yes or correcting our interpretation of the maps:
 - i. Map 1: Access from Horan Road, east of Highway 55.
 - Map 2: A re both western access points on Gene Campbell Road, or is one on Green Valley Drive? Northern access point on Simstown Road. Eastern access point on St. Ivos Road/ Willis Trail.
 - iii. Map 3: western access points on Radio Station Road. What road leads to the southeastern access point?
 - iv. Map 4: access from Gene Campbell Road, north of the split with Short Line Pike?
- 2. The Application states that "internal roads will be constructed throughout the site and used to deliver construction materials and equipment from the laydown areas to other locations withing the Project boundary." The Site Plan maps suggest that those internal roads would generally be constructed to surround the panel parcels. Is that correct?
 - a. How many feet or miles of roadway will be created within the Project site?
 - b. Please confirm that all internal roads would be gravel.
- 3. The Site Plan maps indicate one laydown yard and parking area to be located south of the Project Substation in the southwestern area of the Project boundary.
 - a. Is that laydown yard/ parking area the only one that will service the entire Project site during construction and operation? Please identify any additional laydown / parking areas on the maps.
 - b. Approximately how large will the laydown/ parking area(s) be?
 - c. What will the surface material be for that area (dirt, gravel, paved)?
 - d. If just one laydown/ parking area will be constructed, will facility components and equipment be moved off that site each day?

- e. How will construction workers, facility components and equipment reach other areas within the Project boundary if there is no laydown/parking in those areas?
 - i. What are the routes between the laydown/ parking area and Project parcels in other areas?
- 4. How many solar panels will be located within the Project boundary?
- 5. What is the basis for locating the solar panels within the Project boundary, as shown in the Site Plan maps?
 - a. There is a considerable amount of "undisturbed" acreage (areas without any panels or other solar infrastructure) within the Project boundary, especially on the western side. Please explain how those areas will be used or if not, why those areas will not be used.
 - b. Why are these undisturbed areas included in the Project boundaries?
- 6. Please explain the use of the Collection Easement area.
- 7. The Site Diagram included in the Environmental Site Assessment (Exhibit O, Appendix F) also indicates several "Do Not Disturb" areas within the Project boundary. Please explain what those are and how they are relevant to the Project.
- E. The Application states that "access to the site will be controlled through secure access points and the perimeter of the property will be enclosed by a security fence."
 - 1. From the Site Plan maps, it appears that the fencing will be placed generally around the panels and not along the larger Project boundary. Is that correct?
 - a. How tall will it be?
 - b. What fencing material(s) will be used?
 - c. Will there be barbed wire on top of the fencing?
 - d. Will the fence have a permeable sight barrier, such as a burlap type cloth, or impermeable sight barrier, such as plywood or siding?
 - 2. What other specific security measures will be in place during construction and during operations?

- a. How will access points be secured i.e. locked with a standard keypad or combination lock during certain hours?
- b. Will any security cameras be used?
- c. Will any security personnel be hired?
- d. How will Bobwhite Solar coordinate security with local law enforcement agencies, if at all?
- F. Page 3 of the SAR describes the proposed 161-kV Marion County substation as being located outside of the Project boundary, but the Site Plan maps show it as included within the blue and black dashed outline of the boundary. Please clarify.
- G. How will the energy produced by panels located across the eastern and northern portions of the Project connect to the substation located in the southwestern portion of the Project site?
 - 1. The Exhibit A 1.0 Permitting Context Map shows multiple in-service transmission lines running through the Project site, but the Site Plan maps do not indicate any connections with existing in-service transmission lines, except for the POI in the southwestern portion of the Project. Please explain or clarify.
- H. The Motion for Deviation from Setback Requirements notes that water necessary for construction and operation of the Project may come from wells currently in the Project area fed by underground aquifers <u>OR</u> water hauled in as necessary.
 - 1. Which option should HE assume for the purpose of evaluating impacts?
 - 2. If water is to be hauled in, how many trucks per day or per month would be required to meet construction requirements? How many per day or month to meet operational requirements?
- I. Appendix B of Exhibit O provides a description of legal boundaries in text form (22 pages).
 - 1. Please provide a single map/ graphic simply indicating the locations of individual tracts/ parcels and their associated acreages included within the Project boundary.
 - 2. Please confirm that the legal description of the Project site is consistent with the information provided about the adjoining parcels as part of the Kirkland report i.e. does the boundary of the Project site indicated by the legal description match up with the data describing specific adjacent parcels?

III Setback Deviation Request—The Application indicates that a deviation of the statutory setback provisions will be requested.

- A. Could the solar panels and other structures be re-configured within the site boundaries to meet the setback requirements? The Project site includes numerous acres that are planned to be undisturbed.
- IV Property values and land use—Local landowners are often concerned about the effects on their property values during construction and operation. HE requests information about current property values in the area surrounding the site and property value impacts during the construction phase. We also need clarification on certain aspects of the Kirkland report.
 - A. Section 3 of the Application (Public Notice Evidence) states that Bobwhite Solar mailed letters to "75 landowners whose property border and are within 300 feet of the proposed site and..." However, the Kirkland report (Pages 6 and 7) lists 60 different parcels adjacent to the Project site. Please explain this apparent discrepancy.
 - If the text should read "75 landowners whose property borders <u>or is</u> within 300 feet of the proposed site..." (as stated in Section 6 - Public Involvement Activities), please confirm the number of properties that are within 300 feet of the Project site which are NOT adjacent properties.
 - B. What are the current property values of the properties adjacent to the Project site? Please provide property values of raw land or residential structure values per constructed square foot of developed property in Marion County in the vicinity of the Project site?
 - C. Pages 5 through 7 of the Kirkland report provide information on parcels adjacent to the Project area.
 - 1. What is the source of that data? Please confirm that the data is consistent with that of the Marion County PVA.
 - 2. We would like Northern Bobwhite Solar to confirm the stated distances between residential homes on adjacent properties and the closest solar panels.
 - 3. Please confirm that, for those parcels where the distance between the home and the nearest solar panel is stated as N / A, that the N / A designation is because there is no residential structure on that property.
 - 4. Please confirm that the data in the "Adjoin Acres" and "Adjoin Parcels" columns of the table are presented for the general purpose of providing additional information about the land uses surrounding the Project site.

- 5. For each adjacent parcel, please provide the number of feet that border the Project site.
- D. The Kirkland report provides a matched pair analysis for 44 solar farms ranging from 0.22 MW up to 80 MW, which encompasses properties ranging from 24 acres up to 2,034 acres. The report also provides an analysis of a sub-set of that data, focusing on 15 solar farms larger than 20 MW that dataset includes five solar farms between 70 MW and 80 MW, two of which are located on properties over 1,000 acres in size. At 96 MW covering about 1,300 acres, the Bobwhite Solar Project would be more similar in scale to the largest five solar farms included in the reported analyses, correct?
 - 1. Please isolate the data for each of those five largest properties.
 - 2. What conclusions can be made about potential impacts to adjacent property values specifically looking at those five data points?
- E. What role does visibility of solar panels or other solar infrastructure play in determining potential impacts to property values? For instance, if solar panels are more visible, are impacts to property values greater than if the panels were hidden (by vegetation or other barriers)?

V Traffic—Increased traffic from construction and operation can be an issue for local residents. HE is seeking information about construction phase traffic which was not provided in the Application.

- A. Construction phase
 - 1. How many commuter vehicles will the laydown/ parking area be able to hold?
 - The laydown/ parking area appears to exist under an area that is occupied by solar panels (page 168 of the SAR, or "Map Page 3 of 4" Appendix C) will that area be the last area in which panels are constructed on the land? If not, please explain.
 - a. Please describe how the laydown/ parking area will be converted back to its original state (i.e., a non-gravel/ dirt area) or otherwise prepared for panels erected on this land?
 - 3. In Section 2.1 of Appendix E, is Horace Lane (in Table 1) actually Horan Lane, or are these separate roads? If they are separate, where is Horan Lane?
 - 4. Please identify Green Valley Road, Radio Station Road, and Saint Ives Roads on Figure 1 of Appendix E of the SAR.

- 5. It appears that SR-55 will carry the bulk of all construction traffic, is that true?
 - a. Which direction will that traffic predominately come from heading onto the Site?
 - b. Will any temporary stop lights be installed during construction to help the control the flow of traffic along SR-55 or other roads? If not, specifically what other traffic control measures will be taken?
- 6. Will any residents experience issues accessing their residences during or after construction?
- 7. Please provide an approximate percentage breakdown of where the construction workers will commute from each day, if possible.
- 8. Please provide an approximate breakdown by point of origin for the traffic from other construction-related vehicles (i.e., component delivery vehicles, trailers, etc.).
- 9. Please provide data regarding the estimated weight of each vehicle category (i.e. non-passenger vehicles, heavy-duty delivery trucks, etc. by weight and weight class), including the weight of their loads.
- 10. Will the construction crew work weekends, or only Monday Friday?
- 11. How often will the construction crew work extended hours (from 6pm 10pm)?
- 12. In section 2 of Appendix E ("Traffic Assessment"), Table 3 shows an estimated average of 250 class 2 and 3 commuter vehicles and a peak of 350 vehicles. The text immediately below the table says "an anticipated 100 local workers and 150 non-local workers will commute to the site each day..."
 - a. Is the Applicant assuming one worker will be in each vehicle during average construction times?
 - b. Does this also mean that during peak construction times, 350 workers will arrive in their own vehicles?
 - c. The Economic Analysis (Exhibit N) and other parts of the SAR state that the Project will provide approximately 400 full-time equivalent (FTE) construction jobs over a 12 to 18 month period. Please explain the discrepancy of 250/350 average/peak construction workers in the Traffic Assessment, and 400 FTEs in the Economic Analysis. If 400 FTE is correct, please revise the traffic assessment.

- B. Operational phase
 - 1. Please provide data regarding the weight and frequency of each vehicle category that will be traveling to the site during operations.

VI Dust—Dust especially during the construction phase can be an issue for local residents.

- A. Construction phase
 - 1. What is the protocol or schedule regarding the frequency of spraying down dirt/ gravel roads with water?
 - 2. Will there be any odorous effects generated by the construction of the solar panels?
 - a. What might the sources of those odors be?
 - 3. Will there be odor impacts from diesel fumes or other sources from construction vehicles that will be noticeable by nearby residents?
 - 4. Will any hazardous materials be required in the construction of the solar panels at the Project site? If yes, please describe them and the extent of their use.
 - 5. Will the Applicant apply Best Management Practices (BMPs) during construction, besides those listed in Section 3 of Appendix E (revegetation measures, application of water, covered spoil piles, covered loads, or compacted gravel for roads)?
 - 6. Has the Applicant determined whether any potential runoff from the construction site may contaminate wetlands or ponds in the area? If yes, please describe the results of those studies and measures intended to eliminate that runoff.
- B. Operational phase
 - 1. Will the site be irrigated to promote vegetation growth and reduce potential erosion?

VII Noise—Similar to dust and traffic, noise especially during construction can be an issue for local residents.

A. Construction phase

- 1. What is the number of days, or weeks, that any single-family home might experience periodic noises greater than 55 dB throughout a day?
 - a. Please provide the number of noise receptors, such as homes, that are within 300 feet of a noise generation source of greater than 55 dB during construction, and provide the maximum dB produced by those sources.
 - b. Same question for homes 300 to 600 feet of generation sources.
- 2. How many days and what hours during the day will this level of noise be produced?
- 3. How far away is the Lebanon-Springfield airport from the nearest solar panel?
- 4. Has the Applicant worked with the Lebanon-Springfield airport to ensure noise from construction activities will not interfere with any Federal Aviation Administration guidelines?
- 5. What construction activities will occur between 6pm –10pm?
 - a. What are the average and peak noise levels during this period in those areas where active construction is occurring?
 - b. Why will it be necessary for construction activity to occur during those hours?

B. Operational phase

- 1. Has the Applicant decided on whether the solar panels will be equipped with tracking motors, and can we assume that for the purposes of this review?
 - a. If the Project includes tracking motors, how many tracking motors would be required?
 - b. Please indicate the number of noise receptors within 200 feet, 400 feet and 600 feet of tracking motors if known or solar panels if not.
- 2. In Section 2.4.1. of Appendix D, the SAR states that "at a distance just beyond 200 feet from the source, the sound from the tracking motor would be similar to indoor residence noise levels." Please state what that noise level is in dB and indicate what the dB of a tracking motor is at 200 feet.
- 3. Is there a cumulative noise effect for the transformer, inverters, and motors during daytime hours?

- a. If so, what is the likely range of that cumulative noise?
- VIII Topography/ Scenery—Visual impacts can be important for some projects, depending on the topography, surrounding land uses, and the nature of the project. Computer generated imaging is an effective way to demonstrate these effects; please provide if available.
 - A. Construction phase
 - 1. What is the extent of tree removal that the Applicant will undertake (e.g., percent of forest acreage that will be removed)?
 - 2. How many acres of land is the Applicant expecting to disturb (i.e., clear, flatten, grade, etc.) during the construction period?
 - 3. Appendix H (Threatened and Endangered Species Assessment) states that any tree clearing should occur from October 1st to March 31st. Is the Applicant committing to not removing any trees from April 1st to September 30th?
 - B. Operational phase
 - 1. Will vegetative buffers be grown inside or outside the perimeter fence?
 - a. If the vegetative buffer will be grown outside the property fence, but inside the property line, will the Applicant perform any maintenance on the vegetative buffer? For example, if a storm knocks down trees and/ or branches onto roadsides and/ or neighboring residences' property, will the Applicant's maintenance crew be responsible for cleaning up the area?
 - b. Will damaged or failing buffers be replaced with similar vegetative buffers?
 - 2. On page 5 of Appendix I ("Master Plant List"), various trees and shrubs possess a "size" and "mature size." Is the "size" of the tree/ shrub the height at the time of planting? If not, please provide size at time of planting.
 - a. How many years will it take each tree/ shrub to reach a height of 8 feet?
 - b. How many years will it take each tree/ shrub to reach their respective "mature" sizes?
 - 3. On page 6 of Appendix I ("Sheet 5 of 12 Facility Site Context Map"), of the SAR, what do the black outlines represent?

- 4. For the "Module 1" conceptual planting design, please provide a map (or multiple maps) showing where the potential buffer will be planted along roadsides.
- 5. For the "Module 2" conceptual planning design, please provide a map (or multiple maps) showing where the "selected locations where plantings will be along the north side of the proposed PV arrays."
- 6. For the "Module 3" conceptual planning design, please provide a map (or multiple maps) showing the "adjacent homes or visually sensitive resources" that the vegetative buffer will be placed.
- 7. From page 9 of Exhibit O, how will the Applicant ensure that "each roadway or neighboring residence" will be properly screened by a planted vegetative buffer?
 - a. How will Northern Bobwhite determine whether "mitigation is warranted"?
- 8. Regarding the Gen-Tie Line, please describe how the 70-100 feet tall poles are comparable to existing transmission infrastructure?
 - a. Is existing infrastructure of comparable height between or in proximity to the three poles, as viewed in the sight line or viewpoint locations?
 - b. Why is the Gen-Tie line unlikely to "materially alter" the Project's scenic surroundings?
- 9. We will need to know if any glare exists as the panels rotate over the course of the day and during different times of the year.
 - a. Please provide any studies or independent data or evaluation that justifies the Applicant position that glare will not impact human activity in the vicinity of the Project.
 - b. If the Applicant selects panels that do not tilt, we will still need justification about the presence, frequency and intensity of glare.
 - c. The SAR says the Applicant "will follow Federal Aviation Administration guidelines for determining glare issues for ingress and egress from the airport." Has the Applicant performed any analyses related to potential glare impacts to traffic, residences, businesses, the airport, or other glare-sensitive structures in the Project area? We would request a copy and interpretation of such a study.

- 10. Are there any computer-generated images of what the solar panels, fencing, and other structures will look like immediately after construction is complete? If yes, HE would like to see pictures from different viewpoints (roadways, nearby residences, etc.) around the property and please index those to a map.
- 11. Please provide any additional photos looking into or out of the Project property at different vantage points. We are especially interested in photos that clearly show the topography and existing vegetation at different points along the Project perimeter.
 - a. Please also provide an index map of the location where each photo is taken.

IX Public meeting materials—We want to make sure that the information in the Application is consistent with the information provided to the public thus far.

- A. We are aware of the Public Information Meeting documents provided in Exhibit D and the Public Involvement Documents provided in Exhibit F. Please provide any additional documents/ maps/ graphics/ other materials that have been presented to the community/ other groups as part of outreach efforts, if applicable.
- B. Exhibit D.7 provides a summary transcript of the Public Information Meetings and provides a list of topics raised during the meetings. What specific issues or concerns have been brought up by the public or others as the result of public meetings or through other avenues?
 - 1. Are full transcripts available for the public meetings? We request any written or oral comments offered by the public or government agencies.

X Other permitting activities—HE wants to confirm information provided by the Applicant is consistent with information provided in other permitting processes.

A. Section 13 of the Application lists other permits which Northern Bobwhite Solar may have already obtained or will obtain from other agencies before construction or operation. Please provide copies of any submittals to those agencies, other than those provided, that address any of the specific topics addressed in this inquiry.

XI Economic Analysis (Exhibit N)—This topic is not specifically called for in these applications, but the Board will have an interest in Project benefits.

- A. Project Assumptions (Section 2.2)
 - 1. The text states that the Project is estimated to provide approximately 400 FTE construction jobs and assumes 50 to 100 "local hires". What is meant by the term "local hires"? Does this mean from among existing residents within Marion County?

- B. Section 3 (Assessment)
 - 1. The text notes that assuming a quarter of employment is local (100 people), then a quarter of the labor and value added benefits would accrue to the "local community"
 - i. What is meant by the term "local community"?
 - ii. Please provide a table presenting the range of potential employment related benefits specific to Marion County.
 - 2. Does labor income include wages and benefits? Based on the table data, labor income per FTE is about \$50,500, while the average salary was stated as \$34,000 per year earlier in the report. Please clarify or correct.
 - 3. Please confirm the benefits over the life of the Project (whether 12 or 18 months) is not an annualized table.
 - 4. Section 2.2 suggests that capital construction costs would be \$125 million and Section 3 states that solar materials will be purchased from out of state.
 - i. What portion of the \$125 million in capital costs will be spent in Kentucky?
 - ii. What portion of the \$125 million in capital costs will be spent within Marion County?
 - iii. What are the indirect and induced benefits produced by that level of direct expenditure?
 - 5. Section 2.2 states that the Project will require approximately 2 permanent positions for on-going O&M of the facility. What is the expected annual salary level for those positions?
 - 6. What are the anticipated annual expenditures associated with facility O&M?
 - i. What portion of those expenditures will be made in Marion County?
- C. Section 4 (Government Revenue)
 - 1. Please provide context for the benefits to the local school system \$400K over 35 years averages about \$11,500 per year.
 - i. Please provide details or calculations for how that amount was determined?
 - ii. What portion of the annual school system budget is that?

- 2. How will the \$6 million in taxes be distributed over the life of the Project?
 - i. What entities will receive those tax monies and how much will each of those entities receive per year?
 - ii. How was the \$6 million amount determined? Exhibit N, Appendix A (Memorandum of Industrial Revenue Bond Agreement) notes an Exhibit C that is described as the agreement regarding the obligations to make payments in lieu of taxes. Please provide that document.

XII Decommissioning

- A. The application package suggests that at the end of the Project, the land within the Project boundary will be returned to pre-existing conditions and uses.
 - 1. Please provide a description of decommissioning plan, including what will happen to the facilities/ structures on site and how the area will be returned to pre-existing conditions and uses.
 - 2. What commitments regarding land restoration are included in the landowner lease agreements?

*Kenneth Gish K&L Gates 300 South Tryon Street Suite 1000 Charlotte, NORTH CAROLINA 28202

*Scott Wentzell Northern Bobwhite Solar, LLC 1930 Abbot Street Suite 402 Charlotte, NORTH CAROLINA 28203