COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF GOLDEN)	
SOLAR, LLC FOR A CERTIFICATE OF	
CONSTRUCTION FOR AN APPROXIMATELY 100	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR)	2020-00243
GENERATING FACILITY IN CALDWELL)	
COUNTY, KENTUCKY	

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

Golden Solar, LLC (Golden Solar), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on October 14, 2022. The Siting Board directs Golden Solar to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-* 19 (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

Golden Solar shall make timely amendment to any prior response if Golden Solar 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 Golden Solar fails or refuses to furnish all or part of the requested information, Golden Solar 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Golden Solar shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, and include the length of each construction phase.

- 2. Provide the number of miles between the Golden Solar project and the Caldwell Solar, LLC (Caldwell Solar) Project, Case No. 2020-00244.²
- 3. Explain any overlaps in the projected construction schedules between Golden Solar and Caldwell Solar.
- 4. Describe the potential for cumulative effects on traffic and roadways from construction activities between Golden Solar and Caldwell Solar, and any steps planned to minimize these effects.
- 5. Describe the potential for cumulative effects on property values and land uses from the construction and operation from Golden Solar and Coldwell Solar.
 - 6. Verify if a power purchase agreement has been made. If so, provide.
 - 7. Refer to the Application, Exhibit C, Attachment C, page 24.
- a. Explain whether Exhibit C, page 24 was provided to community leaders in Caldwell, Crittenden, Hopkins and Lyon counties, residents, or other interested parties who have spoken to Golden Solar representatives or attended public meetings.
- b. Explain how the estimate of 150 construction and related service jobs was determined and whether these are direct employment jobs during the project construction phase was determined. Include in the response whether the number of estimated direct jobs is based on National Grid Renewables' previous construction experience for projects of this size.
- c. Explain and provide a list of the types of construction and servicerelated jobs that will be created during the project construction phase.

² Case No. 2020-00244, Electronic Application of Caldwell Solar, LLC for a Certificate of Construction for an Approximately 200 Megawatt Merchant Electric Solar Generating Facility in Caldwell County, Kentucky, (Ky. PSC Apr. 8, 2022).

- d. Explain how the estimate of four full time jobs during the project operational phase was determined.
- 8. Explain whether it is National Grid Renewables policy to hire as many local workers as feasible to perform work during the construction and operational phases of its projects.
- 9. Based upon National Grid Renewable's experience, explain how many of the types of jobs created by projects similar to the Golden Solar project are filled by hiring locally, which in this case is the four county Regional Socioeconomic Area of Interest (Regional SAOI) including Caldwell, Crittenden, Hopkins, and Lyon counties.
- 10. During the project's 25-year operational phase, explain the types of work that will be conducted and the worker skills necessary to inspect, repair, and maintain the equipment and grounds.
- 11. Refer to the Application, Exhibit F, page 3. Explain the rationale for selecting a four county Regional SAOI as opposed to focusing on Caldwell County alone.
 - 12. Refer to the Application, Exhibit F, page 4.
- a. Explain the differences between the JEDI model and the IMPLAN model. Explain why the JEDI model is better suited for conducting economic impact analyses for solar projects than the IMPLAN model. Include in the response differences in estimation results from the two models.
 - b. Explain the source of the multipliers used in the JEDI model.
- c. Explain whether it is possible to conduct the economic impact analysis at the individual county level and, if not, explain why not.

- 13. Refer to the Application, Exhibit F, page 4, Table 2, Estimated Economic Impacts: Kentucky. Also, refer to the Application, Exhibit C, page 24. Table 2 states that Golden Solar is going to create 79.2 jobs during the construction period in the state.
- a. Reconcile the estimated 79.2 job figure with the 150 jobs indicated in Application Exhibit C, page 24.
- b. For both the construction and operational phases of the project, explain the basis for the earnings estimates by job category.
- 14. Verify whether the estimated labor costs for construction and operation include fringe benefits or other indirect labor costs. If not included, verify that Golden Solar will be required to pay the fringe benefits and indirect labor costs.
- 15. Refer to the Application, Exhibit F, page 4, Table 2, Estimated Economic Impacts: Kentucky. Refer to the second Note in Table 2. Explain National Grid Renewables experience with projects of similar size and how that experience influenced the downward adjustment of operational phase indirect and induced employment and wages from the JEDI model output. Include in the response what the JEDI model output was originally prior to the downward adjustment.
- 16. Refer to the Application, Exhibit F, page 5, Table 3, Estimated Economic Impacts: Regional SAOI. Also, refer to Application, Exhibit C, page 24.
- a. Explain the difference between the estimated jobs in the Application, Exhibit C, page 24, and Table 3.
- b. Refer to the second Note in Table 3. Explain how National Grid Renewables' experience with projects of similar size influenced the estimation of operational phase direct employment.

- c. Refer to the second Note in Table 3. Explain National Grid Renewables' experience with projects of similar size and how that experience influenced the downward adjustment of operational phase indirect and induced employment and wages from the JEDI model output. Include in the response what the JEDI model output was originally prior to the downward adjustment.
- d. Explain whether Golden Solar informed the public at the information meetings and discussions that only two of the 150 construction phase jobs would be from within the four county Regional SAOI.
- e. Explain whether Golden Solar informed the public at the information meetings and discussions that only 0.1 of the four total operational phase jobs would come from within the four county Regional SAOI.
- 17. Refer to the Application, Exhibit F, page 5. Also, refer to the Application, Exhibit C, page 24.
- a. Explain how the tax revenues accruing to the state, local counties, and local school districts were derived. Include in the response whether the local counties and school districts include Caldwell, Crittenden, Hopkins and Lyon counties. If not, explain which counties will benefit from the increased tax revenue.
 - b. Provide a list of the types of taxes behind the tax revenue estimates.
- c. Explain whether any sales or income taxes are included in the referenced amounts. If not, provide an estimate of the sales and income tax revenue that will be generated through the construction and operational phases of the project.
- 18. Explain whether Golden Solar intends to pursue an Industrial Revenue Bond (IRB) agreement and a Payment in Lieu of Taxes (PILOT) agreement with Caldwell

County. If yes, explain if the IRB and PILOT agreement will change the government revenue impact.

- 19. Refer to the Application, Exhibit F, page 4, Section 6. The analysis indicates Golden Solar will make up to \$400,000 in charitable donations to the local community. Explain how the charities will be chosen and when the distributions will be made.
- 20. Provide the current economic benefits arising from the real estate to be used in the Project including the current yield of the land and the income derived by the landowners from the current agrarian usage.
- 21. Provide current real property taxes for all parcels based upon current usage.

 Also provide, projected annual real property taxes for all parcels based upon project usage during the operational phase.
- 22. Refer to the Application, Exhibit H, Site Assessment Report (SAR), Section 6 Mitigation Measures, Table 2. Mitigation Measure 12 states Golden Solar will commit to limit pile driving within 1,000 feet of a residence to between 9 am and 5 pm Monday through Friday. Explain whether Golden Solar is familiar with recent Siting Board Orders regarding construction activity time limits and noise mitigation requirements.³
- 23. Refer to the SAR, Section 4.2, Compliance. State whether Golden Solar will commit to limiting noise to maximum daylight sound levels of 55 A-Weighted Decibels at all non-participating sensitive noise receptors within 1,500 feet of construction activity during the project construction phase.

³ See Case No. 2021-00127, Electronic Application of Rhudes Creek Solar, LLC for a Certificate of Construction for an Approximately 100 Megawatt Merchant Electric Solar Generation Facility and a Related 138 KV Nonregulated Electric Transmission Line Approximately 1 ½ Miles in length in Hardin County, Kentucky Pursuant to KRTS 278.700 and 807 KAR 5:110, (KY PSC Mar 4, 2022).

- 24. Refer to the SAR, Attachment B, Hessler Associates, Inc.'s (Hessler) Report, Page 10, Table 5.0.1.
- a. Confirm that a Vermeer PD10 Pile Driver is the type that Golden Solar will use on this project. If not, identify the type of pile driver that will be used and the associated noise levels produced by that machine.
- b. Explain how many pile drivers Golden Solar will use at any one time during construction and whether these machines will be used in close proximity to each other at any time, such that the combined dBA sound levels will exceed those listed in Table 5.0.1. If so, provide an updated chart showing the combined dBA sound levels.
- c. Provide a list of non-participating sensitive noise receptors within 1,500 feet of pile driving construction activity.
- 25. Refer to Application, Exhibit H, SAR, Attachment B, Hessler Report, Plot 1. Provide a Plot similar to Plot 1, showing 55 dBA sound levels around the project area footprint and all non-participating sensitive noise receptors within 1,500 feet of construction activity. If more than one pile driver is to be used in close proximity such that the combined dBA sound level is greater than that listed in Table 5.0.1, include that maximum dBA sound levels in constructing the updated Plot.
- 26. Provide the existing or proposed utilities that will serve the facility during construction and operations. Include information regarding water service that will be used for dust control during construction.
 - 27. Provide the wastewater plans for construction and operations.
- 28. Refer to the Application, Exhibit J, Overall Site Plan 1 and 2, pages 2–3. The Site Plan includes multiple distinct areas separated by roads. Provide information

regarding how these areas will be interconnected, including the impact of the method of interconnection.

- 29. Provide an Electrical One-Line diagram of the Project.
- 30. Provide information on the specifications, model number, and cutsheets of the photovoltaic (PV) cell/solar panels to be used.
- 31. Provide information on where the PV cells/solar panels and the plant equipment are manufactured.
- 32. Identify whether storage is being used and provide safety data sheets/cutsheets for any proposed energy storage system.
- 33. Provide information on the environmental impact of the energy storage system.
- 34. If batteries are to be used for energy storage, provide the life expectancy of the batteries.
- 35. Explain whether the batteries will be recycled. If not, explain how the batteries will be disposed.
- 36. Provide information on any fiber optic or communication network installed as a part of the project and any excavation that may be required for the installation.
- 37. Refer to the Site Assessment Report (SAR), page 0, Section 2.2.3. Provide any communication with neighboring landowners regarding the scenic impacts of the project that occurred after the public information meetings.

38. Refer to the SAR, Section 6, Mitigation Measures, Mitigation Measure 26.

Provide details regarding the Compliant Resolution Program for the Project.

39. Provide any communications with any local, state, or federal agencies

regarding wetlands, endangered species, or historic sites located within the project

boundaries.

40. Locate any cemeteries within the project boundaries. If there are any

cemeteries located within the boundaries, provide the setbacks to be used.

41. Refer to Application, Exhibit D, page 4, Figure 1, Surrounding Community

Map. There is a residential neighborhood within 1,000 feet of the project. Provide the

distance from the residential neighborhood to the Project. Provide the deviation from the

2,000-foot setback that Golden Solar is requesting for this residential neighborhood.

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 SEP 21 2022

*Courtney Pelissero Attorney National Grid Renewables 8400 Normandale Lake Blvd. Suite 1200 Bloomington, MINNESOTA 55437

*Dixie G Cherry Resident Representative 101 Queen Ann Court Princeton, KENTUCKY 42445

*Honorable Jason R Bentley Attorney at Law McBrayer PLLC 201 East Main Street Suite 900 Lexington, KENTUCKY 40507

*Kathryn A Eckert McBrayer PLLC 201 East Main Street Suite 900 Lexington, KENTUCKY 40507

*Katherine Yunker McBrayer PLLC 201 East Main Street Suite 900 Lexington, KENTUCKY 40507

*Larry Curling Caldwell County Judge Executive 100 East Market Street Princeton, KENTUCKY 42445

*Melissa Schmit Attorney National Grid Renewables 8400 Normandale Lake Blvd. Suite 1200 Bloomington, MINNESOTA 55437