

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF GREEN	)	
RIVER SOLAR, LLC FOR A CERTIFICATE TO	)	
CONSTRUCT AN APPROXIMATELY 200	)	
MEGAWATT MERCHANT SOLAR ELECTRIC	)	CASE NO.
GENERATING FACILITY IN BRECKINRIDGE	)	2020-00387
COUNTY AND MEADE COUNTY, KENTUCKY	)	
PURSUANT TO KRS 278.700 AND 807 KAR	)	
5:110	)	

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

Green River Solar, LLC (Green River 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 August 27, 2021. The Commission directs Green River Solar to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 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

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<sup>1</sup> 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).

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.

Green River Solar shall make timely amendment to any prior response if Green River 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 Green River Solar fails or refuses to furnish all or part of the requested information, Green River 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, Green River 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. In the Application, Volume 1, Section I, Item 2, it is stated that Green River Solar proposes to construct the Project with a solar array covering a total of approximately 1,750 acres. This appears to cover all of the areas inside the fence, or the polygons outlined in red on the map in the Application, Volume 2, Attachment A, Exhibit 1, page 7 of 170. If the area of each polygon is estimated using the Geographic Information System (GIS), it appears that the two Alternate Array Locations and the project substation may

not be included in the estimate of 1,750 acres. The alternate array locations are part of the Preliminary Site Layout in Application, Volume 2, Tab 11, Attachment A, Exhibit 3, Map C1.12 and Map C1.13.

a. Using the map in the Application, Volume 2, Tab 12, Attachment A, Cumulative Environmental Assessment, page 6 of 15, make a table with the following information: a meaningful name for each Solar Array Group (a contiguous group of solar arrays), the acreage of the solar arrays (within the fence), the number of leased/purchased parcels, and the acreage of the leased parcel.

b. Confirm whether the Alternative Arrays are to be considered by the Siting Board as part of the Green River Solar Project.

2. Refer to the map in the Application, Volume 1, Tab 1, Attachment A.

a. Confirm whether the residential neighborhoods outlined in green meet the definition used in KRS 278.700 to 278.716 that "Residential neighborhood" means a populated area of five or more acres containing at least one residential structure per acre.

b. Confirm whether there any additional residential neighborhoods in the two-mile radius that meet that definition. If so, include them on the map.

c. Confirm whether there are any of these residential neighborhoods within 2,000 feet of the proposed solar structures.

d. Revise the map to show the following three areas: Breckinridge County Wildlife Education Park, Eva Carman Community Park, and Vance Simmons Park.

3. The map in the Application, Volume 1, Tab 1, Attachment A, is the only map that shows the route of the underground wiring from the solar arrays to the project substation. The preliminary site layout should show the right-of-way (ROW) of the underground wiring from the fenced area of the arrays to the project substation. Submit a new set of maps for the preliminary site layout showing the ROW for the underground wiring for the Project. This can be an overlay to the Application, Volume 2, Tab 11, Attachment A, Exhibit 3, Preliminary Site Layout. Include the names of the property owners that currently own the ROW on the layout.

a. Describe your interaction with property owners of the ROW, particularly those that are not leasing areas for the solar arrays, regarding your need for a ROW through their land.

b. Submit copies of all ROW agreements/easements that are not part of leases for the solar arrays.

4. Regarding karst and sinkholes, see the public comments in the Application, Volume 1, Tab 5, Attachment G, page 20 of 37 and page 37 of 37, and see the photos in the Application, Volume 2, Tab 11, Attachment A, Exhibit 7, Attachment 8, Site Reconnaissance, page 253 of 267, "Photo 4: Sink hole (Parcel 6)," and page 254 of 267 "Photo 5: Additional view of the sink hole (Parcel 6)." See also the comments in the Application, Volume 2, Tab 11, Attachment A, Exhibit 7, that sinkholes were observed on Parcels 6, 52, and 58. GIS information from the Kentucky Geological Survey shows that the entire area of the Project is classified as "intense" karst, except for the northern corner of the solar array located along Mount Merino Cemetery Lane, which is "prone" to karst. More detailed GIS information for sinkholes shows that each solar array has sinkholes,

except for the northernmost solar array located along KY-79. There are two solar array areas, one located near the Meade County Substation along KY-79 and the other located along Sandy Hill Road, with at least 50 percent of the area covered by sinkholes.

a. Confirm whether Parcels 6, 52, and 58 are part of the proposed project.

b. Describe in detail how the presence of sinkholes in the solar array areas will be evaluated.

c. Confirm and describe in detail whether the presence of karst and sinkholes affects the location and construction of the solar panels.

d. Describe any alternative construction techniques for the racking system with karst.

5. Refer to the Application, Volume 1, Tab 9, Attachment A, page 11.

a. Explain whether the estimated 300 jobs are expected to last the entire duration of the construction period.

b. Explain whether the estimated 300 jobs are expected to be full-time employment.

c. Explain the proportion of the estimated 300 jobs that are expected to be low-skilled labor.

d. Explain further how the estimated annual wage of \$40,000 for the 300 jobs was derived.

6. Refer to the Application, Volume 1, Tab 9, Attachment A, pages 12–13.

a. Explain how often the IMPAN software receives updates to economic data, and whether the Pegasus Institute is using the most recent version available.

- b. Explain the IMPLAN model calibration process.
- c. Explain the parameters that are imputed into the IMPLAN model to achieve the results, and whether the set of input parameters are standard in IMPLAN.
- d. Explain how payroll is “flowed through” or distributed to other sectors of the local economies in the IMPLAN model, and whether the economies of the region can or need to be tuned to specific data provided/collected by Green River Solar or Pegasus Institute.
- e. Explain the regional economy to which the IMPLAN model was calibrated. If the regional economy only includes Breckinridge and Meade counties, explain why it is unreasonable to assume that labor would be drawn from surrounding counties and the economic effects would not spill over to those surrounding counties.
- f. Explain how specific direct and indirect economic effects were assigned to Breckinridge and Meade counties.
- g. The discussion focuses on the direct and indirect (secondary) effects of the project. Explain whether there are any induced economic effects resulting from either the construction or the operational project phase.
- h. Of the estimated 300 direct construction jobs, explain how many are estimated to come from Breckinridge and Meade counties.
- i. Of the estimated 81 secondary jobs created during the construction phase, explain how many are estimated to come from Breckinridge and Meade counties.
- j. Of the estimated 81 secondary jobs created during the construction phase, explain how many are expected to be full time.

k. Of the 381 total jobs created during the construction phase, explain how the IMPLAN model or Pegasus Institute estimates the percentage of income spent in the local economies.

l. Explain whether there are any estimated economic jobs or other benefits occurring in Kentucky versus Breckinridge and Meade counties. Include in the explanation whether any labor could be drawn from Indiana to work on the project.

7. Refer to the Application, Volume 1, Tab 9, Attachment A, page 15.

a. Explain whether there are any Kentucky sales tax revenues generated as a result of the project, and if so, provide an estimate of the anticipated tax revenues.

b. Explain whether there will be any income tax revenues generated as a result of the project, and if so, provide an estimate of the anticipated revenues.

c. Explain whether either Breckinridge or Meade counties levy an occupational tax.

d. Explain what the state tax rate of 15 percent refers to.

8. Refer to the Application, Volume 1, Tab 9, Attachment A, page 18.

a. Explain whether the land upon which the project will be built has been used as farmland or some other purpose that generated jobs, income, and tax revenue. If so, provide the number of jobs supported by the land and associated projection, the income and tax revenue (income, sales, property, personal property, etc.) generated.

b. Explain whether the economic impacts summarized on page 18 are gross impacts or net of the impacts of displaced economic activity.

9. Refer to the Application, Volume 2, Attachment A, Exhibit 1, The Property Value Impact Study, page 7 of 170, that states, “The Project will be situated on land parcels utilized for agricultural and forestry purposes, . . . . The Project parcels are bordered by agricultural farmland and rural homesteads.” Provide a breakdown of the percentage of adjoining parcels that are agricultural parcels, residential parcels, and parcels in other land uses (e.g., commercial or industrial). Also provide a breakdown of adjoining land uses by acreage for the same categories.

10. Describe the estimated number of heavy truckloads, delivery truck sizes, and load weights (e.g., for the substation transformer). Describe the heaviest load expected to be delivered to the site and the anticipated delivery route in proximity to the site.

11. Describe any correspondence that Green River Solar has had with the Kentucky Transportation Cabinet or the Breckinridge County and Meade County road departments regarding road weight ratings for the applicable transport roads and road/shoulder damage mitigation measures.

12. Provide the height of the anticipated meteorological tower, and describe whether it will be visible from nearby homes.

13. Describe any communications between Green River Solar, NextEra Energy Resources, or any related affiliates and Meade County during the development of the County's SES ordinance.

14. Describe any communications between Green River Solar, NextEra Energy Resources, or any related affiliates and Breckinridge County regarding Green River Solar's plan to use the Meade County solar facility setbacks in Breckinridge County.

15. Describe any correspondence or communication between Green River Solar and landowners of neighboring parcels regarding the proposed 6 a.m. to 6 p.m. hours of construction.

16. Provide a description of any construction method that will suppress the noise generated during the pile driving process that Green River Solar plans to employ and the associated reduction in noise that each method produces.

a. Provide Green River Solar's planned level of construction using methods that suppress noise during the pile driving process.

b. Provide the estimated additional cost the use of noise suppression methods Green River Solar will incur.

17. Refer to the Application, Volume 2, Tab 11, Attachment 4, Noise Impact Assessment, page 278 of 613.

a. Provide a list of specialty pile drivers that will be used during construction, include the make and model of the equipment Green River Solar will use.

b. Provide the number of pile drivers that will be in use at the same time.

c. Provide a description of any additional construction noise mitigation Green River Solar considered implementing for the project; include the reason why Green River Solar chose not to implement the additional noise mitigation.

18. Refer to the Application, Volume 2, Tab 11, Attachment A, Exhibit 4, Noise Impact Assessment, 5.3 Results. Provide an expanded Table 5-2 to include sound pressure levels at the distances of 500 ft. and 800 ft.

19. Refer to the Application, Volume 2, Tab 11, Attachment A, Exhibit 4, Noise Impact Assessment, 5.4 Additional Recommendations, Item 7.

a. Provide the daytime hours for the construction schedule referenced in the recommendation.

b. Provide the local regulation referenced, that defines the daytime hours to be used for the construction schedule.

20. The Traffic and Dust Study references 150 to 300 workers employed for the construction phase of the project, while the Cumulative Environmental Assessment refers to a daily workforce of 150 to 200 workers, and the calculations in the Economic Impact Analysis are based on 300 workers employed during construction. Clarify the number of workers expected to be employed during both construction and operation.

21. Refer to the Application, Volume 2, Tab 11, Attachment A, Site Assessment Report, page 6 of 22, regarding the use of existing or proposed utilities to service the facility.

a. Confirm how water will be obtained for dust mitigation during construction.

b. Confirm whether electric service from the electric distribution utility, Meade County RECC, will be used during construction.

22. Refer to the Application, Volume 2, Tab 11, Attachment A, Exhibit 3, Map C1.18. Confirm whether the Holy Guardian Angel Cemetery is the same as the Mount Merino Cemetery on Mount Merino Cemetery Lane.

23. Refer to the Application, Volume 2, Tab 11, Attachment A, Exhibit 3, Preliminary Site Layout, Map C1.05. The following requests concern the project substation transformer.

a. Confirm whether the Green River Solar project substation, which has the label “Proposed Merino Solar Project LLC,” is included as part of this project. It does not appear as part of the project footprint in the Application, Volume 1, Tab 1, Attachment A, Project Map, or as part of the site in the Application, Volume 1, Tab 9, Attachment A, The Site.

b. Describe the Proposed Merino Solar Project and its relationship to Green River Solar.

c. Confirm whether the property for the project substation will be purchased or leased.

d. Describe in detail why there is not a security fence around the proposed substation.

e. Confirm whether there will be any visual screening for the project substation.

24. Submit a parcel map or maps that show all of the parcels involved in the Project. The parcels should correspond to those of the Meade County and Breckinridge County Property Valuation Administrators (PVAs). This is to check that the records for all leases, purchases, and easements have been included in the application and that adjacent parcels have been notified. The parcel map must include four types of parcels that are color-coded: (1) those parcels that are leased or purchased for the solar arrays and substation, (2) those parcels that are adjacent to the parcels in (1) and are required for underground wiring ROW, (3) all other parcels adjacent to (1), and (4) all other parcels required for underground wiring ROW. Label each parcel with a unique parcel ID.

- a. Construct a table that shows the parcel ID associated with the Real Property Tax Number (as in the Legal Property Descriptions in the Application, Volume 2, Tab 11, Attachment A, Exhibit 2), or the PVA parcel numbers.
- b. Provide copies of the leases or purchases of the parcels for the solar arrays. Index them with the parcel ID on the map.
- c. Are all the Legal Property Descriptions in Category 1 in the Application?
- d. Submit another table showing each parcel ID associated with a landowner in the list of the adjacent property and participating landowners that have been notified of the application to the Siting Board via certified mail (Application, Volume 1, Tab 2, Attachment B).
- e. Confirm whether all of the landowners were notified by certified mail, including those with underground wiring ROW for the Project.
- f. Confirm whether any of the certified mail was returned. If so, confirm how many letters were returned, and describe any other attempts to reach those landowners.



Linda C. Bridwell, PE  
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of the Kentucky State Board on  
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DATED   AUG 11 2021  

cc: Parties of Record

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