

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF MEADE	)	
COUNTY SOLAR LLC FOR A CERTIFICATE	)	
OF CONSTRUCTION FOR AN	)	
APPROXIMATELY 40 MEGAWATT	)	CASE NO.
MERCHANT ELECTRIC SOLAR	)	2020-00390
GENERATING FACILITY IN MEADE COUNTY,	)	
KENTUCKY PURSUANT TO KRS 278.700	)	
AND 807 KAR 5:110	)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION  
TO MEADE COUNTY SOLAR LLC

Meade County Solar LLC (Meade County Solar), 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 July 29, 2021. The Siting Board directs Meade County Solar to the March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Siting Board. The Siting Board expects the original documents to be filed with the Siting Board 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.

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<sup>1</sup> 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.

Meade County Solar shall make timely amendment to any prior response if Meade County 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 Meade County Solar fails or refuses to furnish all or part of the requested information, Meade County 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 filing a paper containing personal information, Meade County 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. Refer to the Application, Exhibit 10, Attachment 10.1 in general. Explain what a fractional job (e.g., 0.3, 1.2, etc.) represents. Explain whether this represents increased hours for existing jobs or entirely new part-time jobs, or a combination of both.

2. Refer to the Application, Exhibit 10, Attachment 10.1, page 2. Community Energy anticipates that most of the approximately 150 full-time equivalent workers will come from within Henderson or surrounding counties. Approximately 20 percent of the workers (30 workers) are assumed to be specialty workers who come from outside the area.

a. Explain whether the model was calibrated for Meade County specifically or calibrated to include surrounding counties as well.

b. Explain whether the surrounding counties would include counties in Indiana.

c. Explain whether the model includes the effects of the approximately 30 outside area specialty workers living in Meade County or are they assumed to live outside the county and commute in to work.

3. Refer to the Application, Exhibit 10, Attachment 10.1, Table 1, page 3. Explain how the model is calibrated for the state of Kentucky such that it does not include the indirect or induced effects reported for Meade County.

4. Refer to the Application, Exhibit 10, Attachment 10.1, Table 2, page 3. Explain whether the estimated sales tax revenue includes the solar panels or any other material that may not be manufactured or procured in-state. If not, explain the basis for the model's sales tax revenue estimates.

5. Refer to the Application, Exhibit 10, Attachment 10.1, page 4.

a. Explain how the \$41,000 labor income reduction was determined.

b. Explain whether the \$41,000 reduction in labor income includes indirect and induced effects, if the effect is not too small to measure.

6. Refer to the Application, Exhibit 10, Attachment 10.1, page 5. Explain why a discount rate of 2 percent was assumed in the present value calculation.

7. Refer to the Application, Exhibit 10, Attachment 10.1, Table 4, page 5. Explain what is driving the estimated state sales tax revenue during the operational phase of the project.

8. Provide a description of any construction method that will suppress the noise generated during the pile driving process (i.e., semi-tractor and canvas method; sound blankets on fencing surrounding the solar site; or any other comparable method) that Meade County Solar plans to employ and the associated reduction in noise that each method produces.

a. Provide Meade County 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 Meade County Solar will incur.

9. Refer to the Application, Exhibit 12, Attachment 12.5, page 266 of 519.

a. Provide a list of the specialty pile driver equipment Meade County will use during construction, include the make and model of the equipment.

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

10. Refer to Site Assessment Report (SAR), Exhibit 14, Attachment 14.2, page 11 of 129, Section 2.3. Municipal Services and Utilities.

a. Natural gas is supplied by Louisville Gas & Electric Company, not Kentucky Utilities. Explain whether Louisville Gas & Electric Company was contacted to

ascertain that there are not any gas distribution lines crossing the properties or the transmission line.

b. Confirm that Meade County Solar's retail electric service provider is Meade County RECC.

11. The presence of gas wells mentioned in the application may indicate the presence of buried gas gathering lines that are associated with these wells and may interfere with the installation of solar panels. There are two statewide GIS databases that are available to the public: one, which was used in the SAR, from the Kentucky Geological Survey (KGS), and the other from the Kentucky Division of Oil and Gas (KDOG). KDOG focuses on permitting producing gas wells and collects data on their gas gathering lines.

a. Explain whether Photo 5 was taken in St. Martins, Big Springs, or another location.

b. The SAR Map centers on the Target Property, which occurs midway between the Big Spring Section and the Stith Section. Well 10 is within the Stith Valley Property and Well 12 is within the Big Spring Property. All of the gas wells that surround these properties are not included on this map due to the definition of the Target Property. Provide one map for each of these properties using the centroid for each property (see the Notice of Intent) to search for features within 1 or 1.5-mile radius. The EDR Radius Map Report with Geocheck and its results (pages 53–129) should be revised to take this into account and provided in response to this request.

c. The data from the KDOG, which issues permits for producing gas wells, shows that some of these wells in this area have been producing and the operator is Comstock Oil & Gas Inc. or Comstock Resources. In addition, wells to the north and

east of Well 12 have been producing and have gathering lines on the Big Spring Property. Explain whether you contacted the KDOG for information, and if so, provide this information.

d. Explain whether you have contacted the presumed owners/operators of the gas wells and gas gathering lines.

e. Submit copies of any contracts, leases, or agreements concerning the gas systems with owners on the properties for Meade County Solar.

f. Provide a list of the wells that have been plugged. Provide a list of any well that needs to be plugged before construction begins.

g. Explain if any arrangements to have any of the gas gathering lines moved to accommodate the solar panels have been or will be made.

12. Submit the Electrical One-Line diagram of the installation.

13. Revise the 2-mile radius site plan and provide the substation layout diagram, if available.

14. Submit a Site Plan that identifies public structures including Churches, Hospitals and Nursing Homes, etc. If there are no public structures found, the applicant shall provide a statement of compliance with the application.

15. The Site plans provide that the solar farms of the project are at two different sites and are connected electrically by installing underground power lines. Provide information and compliance on the underground installation of the electrical power lines, as well as impact on the surrounding area.

16. Provide a compliance statement on the proposed underground Power feeder to POI as well as the impact on the surrounding area during construction.

17. Provide information on the specifications/ model number of the PV cell/Solar Panel to be used.

18. Submit an over-all tentative schedule of the project, starting from the receipt of the certificate for construction to the completion of the project. The schedule should include the length of each construction phase.

19. Provide information on the temporary power required for construction of the plant.

20. Identify if energy storage is being used and provide SDS sheet for energy storage system.

21. Provide information on the environment impact and the energy storage system imposes.

- a. If batteries are to be used for energy storage, what is the life expectancy of the batteries?
- b. How will the batteries be disposed?
- c. Will the batteries be recycled?

22. Provide information on any fiber optic or any kind of communication network installed as part of the project and any excavation that may be required.

23. Provide information on where the PV cells/Solar Panels are manufactured, indicating the percentage of import and percentage of Made in USA.

24. Provide the missing information/documents from the Transmission Analysis

report by “Electrical Power Engineers” submitted as Exhibit 9 Attachment 9.4, page 5 of

11. Provide the spreadsheets in ‘Table-4 ATC Results’.

25. Provide the missing information/documents from the Transmission Analysis report by “Electrical Power Engineers” submitted as Exhibit 9 Attachment 9.4, page 6 of

11. Provide the spreadsheet in ‘Table 5 Generation Projects’.

26. Provide a compliance statement on Physical Access control as per requirements from NERC, FERC and DHS, if found applicable.

27. Provide information as to whether at end of life when the system is decommissioned will the area be useful for farming. If not, what guarantee will be used to bring the site back to a useful state?

28. Provide a compliance statement on the Mitigation measures to be implemented by the applicant to minimize or avoid adverse effects of the development. Reference KRS 278.708 (4).

29. Confirm if Parcel 131-00-00-003.1 is being used for the project.

30. Verify if all easements have been granted for this project.

31. Provide the noise regulations referenced in Volume I, tab 4 of the Application.

32. Provide any Soil Conservation Plan, if available.

33. Provide the Recommissioning Plan mentioned in the application.

34. Provide any specific landscaping plans to diminish the effect of the project on local view-scapes.

35. Explain whether consideration has been given to the time of day when the support posts for the solar panels are installed using pile-drivers. Explain if the hours for this activity be limited to a window in the middle of the day when residents are less likely to be sleeping and/or resting.

36. Provide information on how noise created by the development of construction roads will be mitigated-

37. Explain how the conclusion was reached that “there will be no adverse impacts on traffic operation in and around the site,” given that the design seems to indicate potential road closures.

38. Provide when the SPCC Plan will be submitted regarding the storage of hazardous materials during construction.

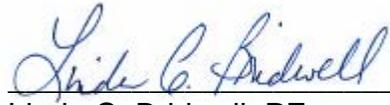
39. Provide whether the Army Corps of Engineers has responded to the AJD.

40. Explain whether any further follow-up is required regarding the four “off-site” properties eligible for inclusion on the National Register of Historic Places.

41. Explain whether specific mitigation measures will be implemented for the three Federally Listed bat species (Gray Bat, Indiana Bat, and Northern Long-eared Bat) that have a potential to occur within the Project Study Area.

42. Explain how any impacts on the potential jurisdictional wetland in the Project

43. Study Area will be mitigated.



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 JUL 15 2021

cc: Parties of Record

Case No. 2020-00390

\*L Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*David S Samford  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*Mark David Goss  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504