

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF HENDERSON	)	
COUNTY SOLAR LLC FOR A CERTIFICATE	)	
OF CONSTRUCTION FOR AN	)	
APPROXIMATELY 50 MEGAWATT	)	CASE NO.
MERCHANT ELECTRIC SOLAR GENERATING	)	2020-00391
FACILITY IN HENDERSON COUNTY,	)	
KENTUCKY PURSUANT TO KRS 278.700 AND	)	
807 KAR 5:110	)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION  
TO HENDERSON COUNTY SOLAR

Henderson County Solar, LLC (Henderson 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 September 24, 2021. The Siting Board directs Henderson Solar to the Kentucky Public Service 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

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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).

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.

Henderson Solar shall make timely amendment to any prior response if Henderson 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 Henderson Solar fails or refuses to furnish all or part of the requested information, Henderson 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, Henderson 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 an explanation of why there is a six to nine month range for construction.

2. Refer to Henderson Solar's response to Item 20 of the Commission Staff's First Request for Information (Staff's First Request). Confirm that for construction activities, average and peak number of workers and average and peak construction

vehicle data provided is correct whether construction occurs over six months or nine months.

3. Provide the number of on-site construction workers by month.

4. Refer to Henderson Solar's response to Item 23(d) of Staff's First Request.

Confirm that the worker parking will be located on-site and will be separate from the staging areas.

5. Explain whether the worker parking area or parking areas will also be bare ground, logging mats, or compacted gravel.

6. Refer to the Application, Volume 1, Exhibit 12, Attachment 12.3. Provide a map of the leased parcels included in the project site that is consistent with the legal boundary description provided in the Henderson Solar SAR.

7. Provide the distance between the Rolling Hills Equestrian Center and the closest portion of the central project section.

8. Refer to Application, Volume 1, Exhibit 2, and Exhibit 2 Attachment.

a. Provide an explanation of why the residential structures located along Lover's Lane are not included in the list of residential neighborhoods within a two-mile radius of the project. Provide a revised map, if necessary.

b. State whether any nursing homes or hospitals are located within the two-mile radius of any of the project boundaries. If so, describe their location, list their distance from the project boundary, and identify those locations on a revised map.

c. For the four churches located within the two-mile radius of the project boundaries, provide the location, list the distance from the project boundary, and identify the locations on a revised map.

9. Refer to the Application, Volume 1, Exhibit 2 Attachment, and Henderson Solar's response to Item 25(d) of Staff's First Request.

a. Explain why the response table includes nine residential structures between 300 and 600 feet of the central and southern sections of the project boundary, but the map identifies neighborhood number 7 as being within 203 feet of the central section. Provide a revised map or revised table as applicable.

10. Refer to Henderson Solar's response to Item 33(c) of Staff's First Request and the Application, Volume 1, Exhibit 12, Attachment 12.7, page 5 of 21 of the Traffic Study.

a. Clarify the traffic on US 41A South generated by the project is 7 vehicles or 17 vehicles.

b. Clarify that vehicle traffic reflects an average day or a peak day.

c. Clarify that vehicle traffic includes both worker commuter vehicles and delivery trucks.

11. Refer to Henderson Solar's response to Item 33(d) of Staff's First Request and to the Application, Volume 1, Exhibit 12, Attachment 12.7, Section 2.6 on page 18 of 21 of the Traffic Study.

a. Clarify that vehicles, including heavy trucks, would access the northern section via an entrance on Lover's Lane, which would require crossing an existing bridge over Canoe Creek.

b. If so, explain how delivery trucks with "an estimated maximum gross weight of 40 tons each" will be able to utilize the bridge over Canoe Creek given its 18-ton weight limit.

c. Provide the number of delivery trucks that will access the northern section using the bridge over Canoe Creek during an average day and during a peak day.

d. Provide more detail about the types of activities required for “pavement surfacing stabilization and/or widening” of the portion of Lover’s Lane with the “sharp existing horizontal curve situated near the bridge end.”

e. Advise of the duration of the pavement surfacing stabilization or widening of Lover’s Lane in that area.

f. Advise of whether work to “repair and restore” the curve will occur before or after project construction.

g. Provide the expected duration of the work to “repair and restore” the curve.

12. Describe the delivery route for the project’s substation transformer.

13. State the number of trucks required for the delivery of the substation transformer.

14. State the weight of each truck required for the delivery of the substation transformer.

15. Provide whether the trucks used to deliver the substation transformer will utilize the bridge over Canoe Creek, given the bridge’s 18-ton weight limit. If this is the case, explain how the bridge over Canoe Creek will be used given its weight limit.

16. Refer to Henderson Solar’s response to Item 33(g) of Staff’s First Request.

a. The response states that traffic stoppages will be “minimal.” Define the term “minimal.”

b. Identify the specific roadways and intersections that may experience traffic stoppages.

c. Describe the anticipated daily traffic stoppages on each of the roadway identified above in terms of number of times and average duration.

17. Refer to the Application, Volume 1, Exhibit 12, Attachment 12.7 of the Traffic Study.

a. Provide a table which estimates the number of commuter vehicles, the number of delivery trucks, and the number of water trucks accessing each site entrance on an average day.

b. Provide a table which estimates the number of commuter vehicles, the number of delivery trucks, and the number of water trucks accessing each site entrance on a peak day.

c. Provide the anticipated time of day in which the morning traffic peak will occur.

d. Provide the anticipated time of day in which the afternoon traffic peak will occur.

18. Refer to the Application, Volume 1, Exhibit 12, Attachment 12.7, Section 2.3 on page 9 of 21 of the Traffic Study. Explain the reference to Exhibit 2.3-1, and the information provided in the Exhibit 2.3-1.

19. Refer to Henderson Solar's response to Item 41(i) of Staff's First Request. Describe in more detail the "minor amount of construction" that would take place after 6:00 p.m.

20. Refer to Henderson Solar's responses to Item 19(a) and Item 41(g) and 41(h) of Staff's First Request.

a. Provide whether pile driving and excavation activities will occur in close proximity to each other.

b. If pile driving and excavation activities will occur in close proximity to each other, provide the cumulative noise impacts of those activities to nearby residents.

c. Provide the cumulative noise effects of the backhoe operations for the electrical install, the pile driving work, and the excavation activities for nearby residents.

21. Refer to the Application, Volume 1, Exhibit 12, Attachment 12.7, Section 2.6 of the Traffic Study. Estimate the range of noise levels associated with the "pavement surfacing stabilization and/or widening" of the portion of Lover's Lane with the "sharp existing horizontal curve situated near the bridge end."

22. Refer to Henderson Solar's response to Item 42 of Staff's First Request. Provide the number of residential structures located within 300-foot intervals from any inverter for each project section.

23. Refer to Henderson Solar's response to Item 43 of Staff's First Request. Provide the number of nonresidential structures located within 300-foot intervals from any inverter for each project section.

24. Refer to Henderson Solar's response to Item 56 of Staff's First Request. Explain how it was determined that vegetative buffers were required for specific locations along the northern section of the project.

25. Refer to Henderson Solar's response to Item 57 of Staff's First Request, which states that "residential dwellings on adjacent lots to the Central and Southern sections of the Proposed Project site are not in close proximity to the Project site."

a. Explain that statement in relation to the Application, Volume 1, Exhibit 2 Attachment, which lists a mobile home park (neighborhood number 7) as 203 feet from the Central section boundary.

b. Explain that statement in relation to the Exhibit 2, which lists several residences as within 800 feet from the southern section boundary.

c. Refer to Henderson Solar's response to Item 58 of Staff's First Request. Explain how "a visual buffer that provides reasonable screening to reduce the views of the SES" was determined without factoring in elevation.

d. Refer to Henderson Solar's response to Item 62 of Staff's First Request, which states that a Glare Study is underway. Provide when the study will be completed and submitted to the Siting Board for review.

26. Refer to Henderson Solar's response to Item 74 of Staff's First Request.

a. Explain whether the Construction Certificate refers to the Siting Board process for which this Application is currently being reviewed.

b. Provide a detailed description of the Highway Encroachment Permit, indicating the state agency involved, any specific permit numbers or types, and the specific purpose for that permit.

c. Provide a detailed description of the purpose of the Building/Construction Permit. Explain whether this refers to the county approved solar site plan.

d. Provide whether a Spill Protection, Control, and Countermeasures (SPCC) plan will be required from the EPA.

27. Refer to Application, Volume 1, Exhibit 10, Attachment 10.1, and Henderson Solar's response to Item 7(c) of Staff's First Request.

a. Confirm whether the statement "approximately 20% of the labor will consist of specialty workers who come from outside the area" represents approximately 30 additional workers to the 150-worker estimate provided in the CBER Report.

b. Confirm that the wages and benefits associated with those 30 workers are in addition to those stated in the CBER report.

c. Refer to Application, Volume 1, Exhibit 10, Attachment 10.1. Confirm that the estimates of Occupational License taxes collected by Henderson County during construction (provided in Table 2) and operations (provided in Table 4) only account for wages related to the project and do not account for the wages generated by additional indirect and induced workers.

d. Provide the total Occupational License taxes that will be collected by Henderson County during construction and annually during operations, accounting for total labor income generated by the project.

e. Provide the net Occupational License taxes collected by Henderson County during construction and annually during operations.

f. Provide the net employment in Henderson County during operations, accounting for the reduction in the local agricultural workforce.

28. Refer to the Henderson Solar's response to Item 72 of Staff's First Request. Provide in detail the process and timing for resolving complaints related to construction activities and project operations.

29. Given that the Unbridled Solar project has recently been approved in the vicinity of the proposed Henderson Solar project:

a. Provide the potential cumulative effects during construction (i.e., traffic and noise) if both projects go forward.

b. Provide the potential cumulative effects during operations (i.e., traffic and noise) if both projects go forward.

c. Provide details on Henderson Solar's analysis of the potential cumulative effects if both Henderson Solar and the Unbridled Solar project are under construction at the same time.

30. Provide whether you would consider coordinating project development activities with the Unbridled Solar project or future solar projects in the vicinity.



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 SEP 13 2021

cc: Parties of Record

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