

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF HORUS)	
KENTUCKY 1 LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	CASE NO.
69.3 MEGAWATT MERCHANT ELECTRIC)	2020-00417
SOLAR GENERATING FACILITY IN SIMPSON)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO HORUS KENTUCKY 1 LLC

Horus Kentucky 1 LLC (Horus Kentucky 1), 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 November 30, 2021. The Siting Board directs Horus Kentucky 1 to the 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.

Horus Kentucky 1 shall make timely amendment to any prior response if Horus Kentucky 1 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 Horus Kentucky 1 fails or refuses to furnish all or part of the requested information, Horus Kentucky 1 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, Horus Kentucky 1 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 E, page 4, Tables IMPLAN Economic Indicators by Impact–Simpson County (IMPLAN Economic Indicators) and IMPLAN Tax Results-Simpson County (IMPLAN Tax Results). Also refer to Horus Kentucky 1's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 55(e), Table Economic Indicators by Impact (Economic Indicators by Impact).

a. Reconcile the difference between the economic impact amount provided in IMPLAN Economic Indicators and the revised economic impact amount provided in Horus Kentucky 1's response to Staff's First Request, Item 55(e).

b. Provide a line-by-line explanation of the assumptions and inputs used to calculate the economic impact of the proposed project in the original economic analysis contained in IMPLAN Economic Indicators and revised economic analysis in Economic Indicators by Impact, and the basis for the difference in the two amounts.

c. Explain whether the Siting Board should consider the calculations presented in Economic Indicators by Impact instead of the calculations presented in IMPLAN Economic Indicators in rendering a decision in this matter.

d. Provide updated IMPLAN economic and tax impact calculations for the state of Kentucky, which would include Simpson County, using the same conservative assumptions behind the Economic Indicators by Impact results.

2. Refer to the Application, Exhibit E, Table IMPLAN Economic Indicators. Explain the meaning of the Value Added and Output columns, and how each was calculated.

3. Refer to Application, Exhibit E, Table IMPLAN Tax Results, which contains incomplete column labels.

a. Provide a copy of this IMPLAN Tax Results with the full name of each column label clearly visible.

b. Explain what each column represents and whether the columns relate to tax payments generated only in Simpson County.

c. Provide an updated copy of the IMPLAN Tax Results based upon the updated calculations provided in Economic Indicators by Impact.

4. Provide the status of the conditional use permits (CUPs) previously granted by the Franklin-Simpson County Planning and Zoning Board (P&Z Board) that were in effect at the time the application was filed in this proceeding.

a. If the CUPs have been deemed invalid, provide the date the CUPs were deemed invalid and a copy of any documents issued by the P&Z Board that deemed the CUPs invalid.

b. If the CUPs have been deemed invalid, state whether the P&Z Board indicated if there are further requirements that must be met for the CUPs to be value, or continue to be valid and enforceable.

5. Provide the status of the Decommissioning Plan, including but not limited the expected date that the Decommissioning Plan will be submitted to the P&Z Board.

6. Provide the status of the Project Development Plan, including but not limited to the expected date that the Project Development Plan will be submitted to the P&Z Board.

7. Refer to the November 15, 2021 hearing testimony of Braden Houston regarding changes to the site lay out, generally.

a. Provide the distances from all noise receptors to the nearest inverters and substation transformers under the new site lay out.

b. Provide a map indicating the location of each noise receptor and the inverters and substation transformers under the new site lay out.

c. Explain how Horus Kentucky 1 categorizes each noise receptor identified in the above responses.

8. Refer to the Application, Exhibit E, Economic Impact Analysis. Also refer to Horus Kentucky 1's response to Staff's First Request, Item 55e, Economic Indicators by Impact. Additionally, refer to KRS 278.706(2)(j), which requires an applicant to provide an analysis of the proposed facility's economic impact on the affected region and the state. Finally, refer to the November 15, 2021 hearing testimony of Woo Smith regarding the economic impact of the proposed project, generally.

a. Using the assumptions and inputs used in Economic Indicators by Impact, provide an analysis of the economic impact of the proposed project on the Commonwealth of Kentucky, including Simpson County, similar to the analysis of the economic impact of the proposed project on Simpson County.

b. Discuss the additional labor, economic, and tax impacts that are estimated to occur in Kentucky outside of Simpson County.



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 NOV 17 2021

cc: Parties of Record

*Brandon T. Murley
Broderick & Davenport, PLLC
921 College Street - Phoenix Place
PO Box 3100
Bowling Green, KENTUCKY 42102

*David F Broderick
Broderick & Davenport, PLLC
921 College Street - Phoenix Place
PO Box 3100
Bowling Green, KENTUCKY 42102

*D. Moran
Broderick & Davenport, PLLC
921 College Street - Phoenix Place
PO Box 3100
Bowling Green, KENTUCKY 42102

*Debbie Thornton
Planning and Zoning Chair
P.O. Box 2868
Franklin, KENTUCKY 42135

*Holly Irwin
Broderick & Davenport, PLLC
921 College Street - Phoenix Place
PO Box 3100
Bowling Green, KENTUCKY 42102

*James H Mooneyhan
Resident Representative
207 Spence Lane
Franklin, KENTUCKY 42135

*Randy Saunders
Nelson Mullins
949 Third Avenue
Suite 200
Huntington, WEST VIRGINIA 25701