

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF MARTIN)	
COUNTY SOLAR PROJECT, LLC FOR A)	
CERTIFICATE OF CONSTRUCTION FOR AN)	
APPROXIMATELY 200 MEGAWATT)	CASE NO.
MERCHANT ELECTRIC SOLAR GENERATING)	2021-00029
FACILITY IN MARTIN COUNTY, KENTUCKY)	
PURSUANT TO KRS 278.700 AND 807 KAR)	
5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO MARTIN COUNTY SOLAR PROJECT, LLC

Martin County Solar Project, LLC (Martin County 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 16, 2021. The Commission directs Martin County Solar 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 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

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).

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Martin County Solar shall make timely amendment to any prior response if Martin 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 Martin County Solar fails or refuses to furnish all or part of the requested information, Martin 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Martin 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 Martin County Solar's response to Commission Staff's First Request for Information (Staff's First Request), Request 2, which states that participating landowners will contact the Kentucky Department of Fish & Wildlife Resources (Fish & Wildlife) to have enrolled land removed from their program. Confirm the number of participating landowners within the project footprint who will need to contact Fish & Wildlife.

2. Refer to page 2 of the Site Assessment Report (SAR), Exhibit F, which indicates there will be an operation and maintenance trailer on site. Confirm the approximate location of this trailer and file a PDF map showing its location.

3. Update the Figure No. 2 in Appendix A of the Noise Assessment Report in the SAR to include the numbers associated with each noise receptor as reported in Martin County Solar's responses to Staff's First Request, Requests 18 through 20.

4. Please refer to the SAR, Section I, and the Kirkland Report, SAR Exhibit B. There is a large difference between the proposed project areas noted in these documents. Section I of the SAR indicates a project area of 2,541 acres and the Kirkland Report indicates a project area of 4,122 acres. Martin County Solar has confirmed in previous responses that the project footprint was expanded after the Kirkland report was written.

a. Confirm and clarify in detail whether the Kirkland Report was conducted using a project footprint of 4,122 acres.

b. Confirm the project area.

5. Refer to the Staff's First Request. Martin Co. Solar indicated that the project footprint expanded after the Kirkland Report on the impact to adjoining property was written. Confirm whether changed footprint impacts the "Adjoining Use Breakdown" table shown on page 4 of Exhibit B in the SAR.



_____ for
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 AUG 02 2021

cc: Parties of Record

Case No. 2021-00029

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