

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF SEBREE)	
SOLAR, LLC FOR A CERTIFICATE TO)	
CONSTRUCT AN APPROXIMATELY 250)	
MEGAWATT MERCHANT SOLAR ELECTRIC)	
GENERATING FACILITY AND AN)	CASE NO.
APPROXIMATELY 4.5 MILE NONREGULATED)	2021-00072
ELECTRIC TRANSMISSION LINE IN)	
HENDERSON COUNTY, KENTUCKY AND)	
WEBSTER COUNTY, KENTUCKY PURSUANT)	
TO KRS 278.700 AND 807 KAR 5:110)	

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

Sebree Solar, LLC (Sebree 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 October 15, 2021. The Siting Board directs Sebree Solar to the Kentucky Public Service 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

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).

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.

Sebree Solar shall make timely amendment to any prior response if Sebree 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 Sebree Solar fails or refuses to furnish all or part of the requested information, Sebree 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, Sebree 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, Tab 10, Attachment A, page 4. Explain whether IMPLAN can account for the loss of economic activity and jobs. If so, explain whether the Pegasus Institute modeled the effects of the post-construction loss of construction related economic activity and jobs.
2. Refer to the Application, Tab 10, Attachment A, page 4.

- a. Explain whether any of the 86 additional jobs during the construction phase could be expected to remain in the area post-construction.
 - b. Explain whether the 86 additional jobs are exclusively located in Henderson County.
3. Refer to the Application, Tab 10, Attachment A, page 4.
 - a. Explain generally how often IMPLAN datasets are updated.
 - b. Explain how recently the relevant datasets for this analysis were updated.
4. Refer to the Application, Tab 10, Attachment A, page 4. Explain whether the total community benefit is in present value.
5. Refer to the Application, Volume 1, Tab 10, Attachment A, pages 11–12.
 - a. Explain the IMPLAN model calibration process.
 - b. Explain whether the regional economy to which the IMPLAN model was calibrated includes Henderson County only. If so, 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.
 - c. Of the approximately 386 jobs created during the construction phase, explain how many of those jobs will come from Henderson County, Kentucky, and, since Evansville, Indiana is close, from outside of Kentucky.
6. Refer to the Application, Tab 10, Attachment A, page 12.
 - a. Explain whether any estimates to the number of each job type to be employed have been made.

b. Explain how the \$40,000 average annual salary was calculated from the wage data.

7. Refer to the Application, Tab 10, Attachment A, page 13.

a. Explain how IMPLAN predicts or models the amount of increased household spending.

b. Explain how IMPLAN predicts or models to which and to what extent that increased household spending is spent in various sectors of the economy.

c. Explain whether IMPLAN can predict the opening of new local businesses to meet increased spending in sectors that lack the supply or capacity to meet new demand.

8. Refer to the Application, Volume 1, Tab 9, Attachment A, pages 15. The discussion focuses on property taxes only.

a. Explain whether there are any sales or income tax revenue effects in Kentucky as a result of the project. If there are not, explain why not. If there are, provide an estimate of the sales and income tax revenue effects for both the construction and operational phases of the project.

b. Explain whether Henderson County levies an occupational tax.

c. Explain whether the tax implications for Sebree Solar of not implementing a Payment In Lieu of Taxes (PILOT) arrangement with Henderson County and Kentucky extend beyond payment of any property taxes.

d. Provide an update on the status of the PILOT negotiations.

9. Refer to the Application, Volume 1, Tab 9, Attachment A, page 17.

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 17 are gross impacts or net of the impacts of displaced economic activity from the project site.

10. Refer to the Application, Volume 2, Tab 14, Attachment A, page 17.

a. Explain whether any alternative routes or route segments were considered in selecting the proposed transmission line route. If so, provide a map of suitable scale showing alternative routes or route segments in addition to the selected route.

b. Explain whether an environmental impact statement will be required for the transmission line.

c. Explain whether there are any cemeteries, historical sites, archeological sites, or environmentally sensitive sites within one mile of the proposed right of way. If so, include them on the map requested in part a. above.

d. If the proposed route is approved, explain whether there will be hindrances to the construction schedule, such as endangered bat nesting areas.

e. Refer to KRS 278.714(3). Explain how the proposed transmission line will not result in significant degradation of the scenic factors (viewshed) of any property owner within sighting distance of the proposed line.

11. Explain whether the boundaries for the project on the map dated 8/6/2021, in the Application, Tab 2, Attachment A, "Project Map" are the final ones for the Certificate to Construct.

a. Explain whether or not the following boundaries are the same as the ones in the Application, Volume 2, Part 3.

(1) Tab 13, Attachment A, page 6 of 13, titled "Figure 1 Site Location", dated 8/6/2021;

(2) Tab 14, Attachment A, titled "Proposed Transmission Line" dated 8/6/2021; and

(3) Tab 14, Attachment B, titled "Conceptual Site Plan Sebree Transmission Line Refer to the project boundaries on the maps in Application, Volume 2, Tab 12, Attachment A, Exhibit 6," Phase I Environment Site Assessment".

b. Concerning Tab 12, Attachment A, Exhibit 6, Figure 1 "Location Map", provide the parcels and acreage that is not included in the parcel map in the Project Map in the Application, Tab 2.

(1) Provide the parcels and acreage found in Tab 2 of the Application, and missing in Exhibit 6 of the Environmental Site Assessment (SAR).

(2) Explain if any further site assessment is needed for the missing parcels.

(3) Explain if the Summary on page 8 of 392 of the SAR need to be changed using the Application boundary in Tab 2.

12. Refer to the maps in the Application, Volume 2, Attachment A, Exhibit 3, "Preliminary Site Layout".

- a. Explain how access will be provided to the cemetery on Map C1.05.

Provide the name of the cemetery and the most recent burial at this site.

- b. Explain how access will be provided to the cemetery on Map C1.07.

Provide the name of the cemetery and the most recent burial at this site.

- c. Explain if the cemetery on Map C1.13 is outside the project boundary. Provide the name of the cemetery and the most recent burial at this site.

- d. Explain if the cemetery on Map C1.11 is in the lower left corner. If so, explain if it is outside the project boundary. Provide the name of the cemetery and the most recent burial at this site.

- e. Alternate Arrays on C1.11 cover part of the northern alternate parcel and some of parcel 60-67 within the project boundary. Explain whether there any plans to extend alternate solar arrays further into the northern alternate parcel.

13. Provide the Parcel Number for each Legal Property Description in the Application, Volume 2, Attachment A, Exhibit 2.

14. Refer to the Application, Volume 2, Tab 12, Attachment A, Exhibit 4, Appendix B, page 24 of 33.

- a. Provide a similar table containing the Sound Pressure Level dBA and dB at the participant receptors location, when pile driving occurs at the nearest distance during the construction phase.

- b. Provide a similar table containing the Sound Pressure Level dBA and dB at the Non-participant receptors location, when pile driving occurs at the nearest distance during the construction phase.

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

a. Provide Sebree 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 Sebree Solar will incur.

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

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

16. Provide an Electrical One-line diagram of the Plant & the Plant Substation and an Electrical One-line diagram of the POI Substation (Reid EHV) and the Transmission line.

17. Refer to the Application, Volume 1, Tab 9 (MISO DPP 2019 Central Areas Study Phase 1 Report).

a. Confirm whether Sebree Solar will take further actions to ensure compliance with the additional 1.2MVAR required pursuant to FERC Order 827.

b. Confirm whether Sebree Solar will take further actions to ensure compliance regarding thermal constraints caused by the Project.

c. Confirm whether Sebree Solar will take further actions to ensure compliance regarding voltage violations.

d. Confirm whether there are any public or private parks, churches, hospitals or nursing homes within a two-mile radius of the proposed solar facility.

e. Confirm whether there are any public or private parks, churches, hospitals or nursing homes within a one-mile radius of the proposed transmission line.

18. Provide an updated Site Plan and updated layout drawings C1.03 to C1.14 that indicate the location of the following:

a. Solar meteorological station and control house;

b. Fencing to the substation; and

c. The internal power network and connection between inverters and the substation, specifically at the road crossings.

19. Provide an updated transmission line map that indicates all support structures as required by KRS 278.714(2)(b)(1).

20. Provide a detailed description of all proposed transmission line structures.

21. Provide details of the proposed visual screen, including any drawings, cutsheets, pictures, etc., if it is other than vegetative. If the proposed screen is vegetative only, then indicate it as vegetative screen on the legend of the drawings.

22. Identify historical and significant head stones and describe any maintenance plan for the cemeteries located inside the Project boundaries. Confirm if the cemeteries are abandoned.

23. Provide the solar irradiation levels that are used in calculations for determining the acreage of the plant and a graphical demonstration of the land use of the plant (Ex: Provide a pie chart for total acres by percentage for solar arrays and other

associated equipment, acres in percentage for internal roads, total acres in percentage for buffer and setback, etc.)

24. Provide information on the specifications, model number, and cutsheets of the photovoltaic (PV) cell/solar panels to be used.

25. Provide information on where the PV cells/solar panels and the Plant equipment are manufactured. Indicate the percentage of imported products and percentage of Made in USA products.

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

27. Identify if energy storage is being used and provide safety data sheets/cutsheets for any proposed energy storage system.

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

a. If batteries are to be used for energy storage, provide the life expectancy of the batteries.

b. Explain if the batteries will be recycled or how will they be disposed.

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

30. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, and including the length of each construction phase.

31. Provide information about the existing and proposed utilities for the plant and for service to the proposed facility buildings.

32. Provide information about construction of any residential quarters or installing trailer homes for the operations staff.

33. Provide the specific noise regulations that are referenced in the application.

34. Provide a copy of any soil conservation plan Sebree Solar has developed.

35. Provide a copy of any decommissioning plan Sebree Solar has developed which describes the environmental impact of decommissioning.

36. Provide a copy of any construction, dust control, and traffic management plan Sebree Solar has developed.

37. Confirm if any meetings with the US Army Corps of Engineers and the US Fish and Wildlife Service are planned in the near future regarding wetland delineations or threatened or endangered species.

38. Refer to Application, Volume 1, Tab 5, Exhibit 10.

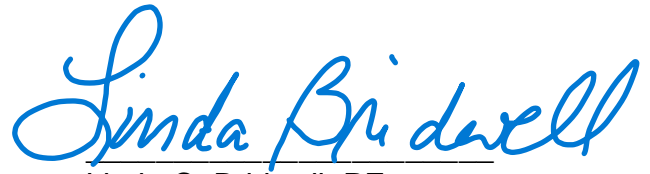
a. Will all jobs and wages be attributable to the Project site in Henderson County, Kentucky, or explain whether a portion of said wages be attributable to locations in Kentucky but outside Henderson County or outside the state.

b. Explain what portions of the expected investment will be attributable to purchases within Henderson County, Kentucky, or locations in Kentucky but outside Henderson County, and outside the state.

c. Provide the sources and computational base and multipliers used in the IMPLAN model that is used to calculate the asserted impact.

d. Explain the net of the anticipated Project wages less any wages currently generated in the Project site. Clarify the working location of the three employees and their expected work tasks.

- e. Provide the economic impact analysis for the local region and Kentucky.
- f. Provide the current property taxes for the parcels comprising the Project site. Explain if the personal property tax calculator takes an account depreciation.
- g. Explain whether there will be any Kentucky state and local sales or use taxes as a result of investments in property or taxable services. If so, explain what portion are expected to be attributable to Henderson or Webster counties and Kentucky outside of Henderson and Webster counties.
- h. (1) Provide estimates of Kentucky Corporate Income and Limited Liability Entity Taxes.
(2) Provide estimates of Kentucky state personal income tax and, by jurisdiction, any applicable occupational taxes.
- j. Indicate which state-level tax abatements Sebree Solar might seek and their anticipated periods.
- k. Provide a projection for your annual expected output for the 35-year Project, net of the output that would be expected if the properties remained used in farming, to include sources and computations.



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 OCT 01 2021

cc: Parties of Record

Case No. 2021-00072

*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

*Stephen R. Henry
Webster County Judge Executive
3939 State Route 109 South
Providence, KENTUCKY 42450