

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF RHUDES)	
CREEK SOLAR, LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	
100 MEGAWATT MERCHANT ELECTRIC)	
SOLAR GENERATING FACILITY AND A)	CASE NO.
RELATED 138 KV NONREGULATED)	2021-0027
ELECTRIC TRANSMISSION LINE)	
APPROXIMATELY 1 1/2 MILES IN LENGTH IN)	
HARDIN COUNTY, KENTUCKY PURSUANT)	
TO KRS 278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO RHUDES CREEK SOLAR, LLC

Rhudes Creek Solar, LLC (Rhudes Creek 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 December 7, 2021. The Siting Board directs Rhudes Creek 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 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

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).

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.

Rhudes Creek Solar shall make timely amendment to any prior response if Rhudes Creek 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 Rhudes Creek Solar fails or refuses to furnish all or part of the requested information, Rhudes Creek 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, Rhudes Creek 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 Rhudes Creek Solar's Site Assessment Report (SAR), Attachment 19, Inverter Noise Profile Diagram. In the southwest corner of grid reference D3, there is a dwelling depicted as approximately 130 meters, or 427 feet, from the nearest inverter. In the center of grid reference D7, there is a dwelling depicted approximately 100 meters,

or 328 feet, from the nearest inverter and 160 meters, or 525 feet, from the next nearest inverter. Refer to the SAR Section 4, Anticipated Noise Levels, page 10, where it states, “[T]he closest three adjoining residential dwellings are at 417, 830, and 879 feet away.” Explain this conflicting information. If it will be addressed by the forthcoming noise study, reference may be made to that document with specific designation to where it is explained in the study.

2. Refer to the SAR, Attachment 7, Glare Analysis. The analysis appears to find some amount of green and yellow glare produced by the proposed project’s solar panels. Provide a written summary of the findings of the Glare Analysis, including whether and to what extent local residents or drivers on local roads would be impacted by glare as well as how the results of the glare analysis affect the development plan for the proposed project and any possible mitigation.

3. Refer to the SAR Section 5, Effect on Road, Railways, and Fugitive Dust, page 12, where it states, “There will be up to 150 construction employees and parking will be onsite.” Also, refer to Rhudes Creek Solar’s responses to Siting Board’s First Request for Information, page 6, where it states, “Employees arriving to the site will carpool, likely in 5 or 6 vans per day for pickup and delivery.” Clarify if employees will most often drive their own vehicles, carpool together in vans, or a mix of modes. Also, describe any incentives or other measures that would be used to encourage carpooling or discourage single-occupant vehicles during construction.

4. Refer to the SAR Section 1, page 3, where it states, “If water service is required during construction or operation, the Project is within the Hardin County Water District #2 service territory.” Also, refer to the SAR Section 5, page 13, where it states,

“A number of dust mitigation measures will be employed to minimize fugitive dust emissions. These include, but are not limited to:

- Retaining natural windbreaks and barriers
- Frequent water applications to wet surfaces and prevent fugitive dust
- Reduced speed on site and control of vehicle access
- Washing equipment prior to leaving the site
- Covering open trucks
- Using gravel compacted roads for construction and maintenance

Explain to what extent Rhudes Creek Solar expects to use on-site groundwater wells or contracted water service from Hardin County Water District #2 as its primary source of water supply for dust mitigation during construction.

5. Refer to the SAR Section 5, page12, regarding impacts on railways, where it states, “Omega Rail Management has provided clear instructions and requirements for safety and operating procedures during construction.” Provide a copy of those instructions and requirements.

6. Refer to the SAR Section 4, Anticipated Noise Levels. Noise generation from panel tracking motors is not included in this assessment. Indicate whether the ongoing independent noise study (represented to be completed December 2021) will include an assessment of noise generation from panel tracking motors. Provide the full independent noise study.

7. Refer to the new map provided in Rhudes Creek Solar’s response to Siting Board’s First Request for Information. The orange-dashed lines representing the 1,000-foot radius from the project bisect the easternmost solar arrays and nearly touch the array

areas in a few other parts of the project layout. Explain this layout or modify the map as needed.

8. Refer to the SAR Section 2, Compatibility with Scenic Surroundings, page 6, where it states, "Preparation of a decommissioning plan to reclaim, revegetate, and restore the properties consistently with zoning classifications." Provide a copy of the decommissioning plan.

9. Explain what steps will be taken to avoid adverse effects to, or improve, the water run-off flow pattern currently occurring in front of and on the Fraser property at 3562 Hardinsburg Road. Include any measures designed to avoid interference with the free flow of runoff water from surrounding property that now exists. Address this both during construction and during operation of the facility and the newly built transmission line.

10. Refer to the SAR, Attachment 13, Final Stormwater Pollution Prevention Plan, page 13. Regarding post-construction stormwater control, the document states, "The Project does not propose any structural BMPs since the post-development conditions vastly improve the ground cover compared to pre-development conditions." Explain how post-development conditions will be improved from the standpoint of stormwater management relative to existing conditions.

11. Refer to the SAR, Attachment 13, page 17, where it states, "A Qualified Inspector shall conduct regular site inspections for the implementation of this SWPPP through final stabilization of the Project Site. Inspections shall occur at an interval set forth in the Construction General Permit." How frequently will the site be inspected during the construction phase?

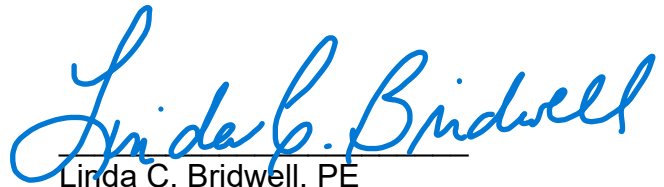
12. How frequently will the site be inspected for stormwater management post-construction?

13. Describe any conversations with individual adjacent landowners regarding stormwater concerns, including the specific nature of their concerns and Rhudes Creek Solar's plans to address those concerns.

14. The north central part of the project site may be within the Protection Zone of the Cecilia Gas Storage Field (about 1.5 miles from injection wells) that belongs to the city of Elizabethtown, Kentucky. Confirm whether it is. Detail any conversations with the Energy and Environment Cabinet's Division of Oil and Gas, the city of Elizabethtown Gas Department, or ANSGeo, author of the Final Geotechnical Study (Attachment 14 of the SAR), regarding whether there are any limitations to boring or pile driving within the Project boundary due to proximity to the gas storage field.

15. Louisville Gas & Electric Company serves the area with natural gas. Detail any conversations with it concerning whether there are any underground distribution lines bordering or on the Project site.

16. The site is primarily in the Nolin RECC electric service area. However, the eastern part is in Kentucky Utility territory. Confirm this fact. If it is correct, explain how Rhudes Creek Solar will abide by these electric service area boundaries for electric service.



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 NOV 23 2021

cc: Parties of Record

Case No. 2021-00127

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