

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

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	)	2021-00127
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 FIRST 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 November 9, 2021. The Siting Board directs Rhudes Creek 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

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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).

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 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 the Application, Attachment A (Two-Mile Vicinity Map).
  - a. Explain whether these neighborhoods have been identified using the definition in KRS 278.700.

b. Describe the number of neighborhoods identified, including the number within the two-mile radius and the number outside it.

c. Provide a new map (or an updated and zoomed in version of this map) that includes the following additions: 1,000-foot radius, 2,000-foot radius, one-mile radius, locations of individual homes that are not part of the identified residential neighborhoods (such as are depicted in Attachment 19 of the Site Assessment Report (SAR)), location of project substation and interconnection point, and location of proposed transmission line.

2. Refer to the SAR, Attachment 1 (Site Development Plan). Describe the number of entrances to the site (including during both construction and operational phases). Explain and identify images in Attachment 1 that depict the project's site entrances.

3. Refer to the SAR, Section 5 (Effect on Road, Railways, and Fugitive Dust).

a. Explain the anticipated length of the project's construction phase.

b. Detail the number and approximate weight classes of the heavy and light duty trucks anticipated on site per day during the construction phase.

c. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.

d. Explain the anticipated peaks in equipment deliveries, traffic to the site, and number of workers on site across the duration of the construction phase.

4. Describe all discussions and provide all correspondence between Rhudes Creek Solar and the Kentucky Transportation Cabinet District 4 Engineer regarding road weight ratings for heavy deliveries to the site and any anticipated road/shoulder damage

or mitigation measures. Specify date, persons in the conversation, and substance of the conversation.

5. Describe all discussions and provide all correspondence between Rhudes Creek Solar and the Hardin County road department regarding the proposed project, traffic impacts, and heavy deliveries to site. Specify date, persons in the conversation, and substance of the conversation.

6. Describe all discussions and provide all correspondence between Rhudes Creek Solar and adjoining property owners or other county stakeholders regarding the proposed working hours of 6 a.m. to 9 p.m. Monday to Friday during the construction phase. Specify date, persons in the conversation, and substance of the conversation, including any feedback given to Rhudes Creek Solar from property owners and stakeholders regarding the proposed working hours.

7. Refer to the SAR, Section 5 (Effect on Road, Railways, and Fugitive Dust). Provide a full traffic study that supports this section of the SAR and its conclusions, if any was prepared.

8. Refer to the SAR, Section 4 (Anticipated Noise Levels). Provide a full noise assessment that supports this section of the SAR and its conclusions.

9. Detail any contracts by which Rhudes Creek Solar has negotiated to pay, contracted to pay, or paid, any compensation, whether cash or otherwise, to non-participating landowners near the project. Include the terms of that agreement and which properties are involved in terms of distance to the project boundaries.

10. Detail the status of any applications for zoning changes or conditional use permits that are required for this project.

11. Detail the status of any litigation in state or federal court, or before an administrative agency other than the Siting Board involving this project.

12. Refer to the Application, Attachment K, in general. If not already addressed, explain any other assumptions that were made in order to perform this analysis.

13. Refer to the Application, Attachment K, page 2. Detail the proportion of the 100 million investment that is projected to be spent on (1) land acquisition, (2) site preparation, (3) solar panel and electrical equipment installation, and (4) landscaping and security fencing.

14. Refer to the Application, Attachment K, pages 2–4. Explain if the IMPLAN model was calibrated to Hardin County only. If so, explain why it would not be a reasonable assumption to expect that the construction phase labor would also be drawn from contiguous counties.

15. Refer to the Application, Attachment K, page 3. Explain the economic impact of the project during both the construction and operational phases if the model was calibrated to the Commonwealth and not just Hardin County.

16. Refer to the Application, Attachment K, page 3.

a. Set out what version of IMPLAN was used for this analysis.

b. Provide information on how often IMPLAN datasets are updated.

17. Refer to the Application, Attachment K, page 4. Explain whether there are any direct, indirect, or induced economic effects for the rest of Kentucky outside Hardin County.

18. Refer to the Application, Attachment K, page 4.

a. Explain what proportion of the 312 total new jobs are expected to be full time.

b. Of the 312 total new jobs, explain if IMPLAN provides information as to the type of job expected to be created in Hardin County (e.g. retail, food service, government, etc.). If so, set these forth.

c. Detail which of the 312 jobs created in Hardin County during the construction phase of the project, are expected to remain at the end of that phase.

19. Refer to the Application Attachment K, page 5. Explain whether there any income tax revenues that will be paid to the Commonwealth. If so, provide an estimate for both the construction and operational phases of the project.

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

a. Provide Rhudes Creek 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 Rhudes Creek Solar projects it will incur.

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

21. Provide a table containing the distance and anticipated Sound Pressure Level dBA at each project participant residence, within 300 feet of pile driving activities, during the construction phase.

22. Provide a table containing the distance and Sound Pressure Level dBA at each project non-participant residences, when pile driving occurs within 500 feet of pile driving activities, during the construction phase.



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 OCT 26 2021

cc: Parties of Record

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