

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF RUSSELLVILLE)	
SOLAR LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	CASE NO.
173 MEGAWATT MERCHANT ELECTRIC SOLAR)	2021-00235
GENERATING FACILITY IN LOGAN COUNTY,)	
KENTUCKY PURSUANT TO KRS 278.700 AND)	
807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO RUSSELLVILLE SOLAR LLC

Russellville Solar LLC (Russellville 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 May 31, 2022. The Siting Board directs Russellville 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 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.

Russellville Solar shall make timely amendment to any prior response if Russellville 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 Russellville Solar fails or refuses to furnish all or part of the requested information, Russellville 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, Russellville 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. The Tennessee Valley Authority (TVA) webpage for Logan County Solar² project lists documents that have been submitted in that proceeding. Submit any documents that have been submitted in TVA proceedings that have not yet been submitted in this proceeding. Including communication with the U.S. Fish and Wildlife

² Russellville Solar LLC and Logan County Solar are used interchangeably by the developer for this project.

Service, communication with the Kentucky Heritage Council, a Wetland Definition Report dated July 31, 2019, and a Historic Architecture Survey and Assessment Draft Report dated March 29, 2022.

2. The transmission line to be utilized by Russellville Solar is owned by TVA. The electric distribution system in the project area is served by the TVA. Provide the TVA best management practices for designing, constructing, and operating the substation, switchyard, and the solar facility.

3. Refer to the Application, Attachment D, page 3. The table lists adjoining landowners. Submit a map showing parcel boundaries and the Russellville Solar boundaries. Label the adjoining parcels with the parcel number.

4. Refer to Russellville Solar's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 29. An updated preliminary site layout was provided that indicated 12 access points. During the site visit, representatives of Russellville Solar indicated a smaller number of access points was anticipated. Provide the most current site layout map, including:

- a. Location of all planned site entrances.
- b. Roadways, including existing roadways and any road segments that will need to be constructed for site access.
- c. Vegetative buffers, including those existing and planned.

5. Logan County Ordinance 19-920-06 allows adjacent landowners to waive vegetative screening requirements. Provide any agreements with landowners pursuant to this ordinance. Identify these parcels on the map required in response to Item 4 above.

6. Provide any correspondence with the Logan County Road Department regarding the required widening and maintenance of AP Miller Road.

7. Provide the transportation plan for the project's substation transformer to the site, including any improvements necessary to Joe Montgomery Road or any other roads.

8. Provide visual representations of the proposed project site, including any relevant overlays of the proposed facility equipment and vegetative screens. Specifically, include any before and after visualizations depicting the site with the solar arrays and vegetative screening.

9. Refer to the HDR Noise Memo provided in Russellville Solar's response to Staff's First Request, Item 5.

a. The noise receptors identified in Table 1 and Table 4 are not the receptors closest to the project boundary found in Figure 1 of the memo. Explain why receptors 1-5 on Figure 1 of the HDR Noise Memo are identified as the receptors that will experience the greatest construction noise instead of receptors 10-15 which are closer.

b. The memo states that tracking motor only operate for a few seconds at a time. Provide a description of the tracking motor operation, including how many seconds the motor engages at a time and how frequently per hour the motor engages.

10. Describe any mitigation measures for tracking motor noise.

11. Provide any written or verbal concerns Russellville Solar has received about the proposed tracking motor noise levels and frequency.

12. Refer to the Application, Attachment G, Economic Impact Report page 2 and the Site Assessment Report (SAR) Exhibit E, Section 3.2. Both documents reference

450 construction workers during peak construction. Also, refer to Russellville Solar's response to Staff's First Request, Item 30(c). The response indicates 250 construction workers during peak construction. Provide the correct number of construction workers during peak construction.

13. Refer to the SAR Exhibit E, Section 3.2. Provide any incentives or measures that will be used to encourage ridesharing for the construction phase of the project.



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 MAY 19 2022

cc: Parties of Record

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