

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF BLUE MOON)	
ENERGY LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY 70)	
MEGAWATT MERCHANT ELECTRIC SOLAR)	CASE NO.
GENERATING FACILITY AND NONREGULATED)	2021-00414
ELECTRIC TRANSMISSION LINE IN HARRISON)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO BLUE MOON ENERGY, LLC

Blue Moon Energy, LLC (Blue Moon Energy), 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 13, 2022. The Siting Board directs Blue Moon Energy 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

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).

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.

Blue Moon Energy shall make timely amendment to any prior response if Blue Moon Energy 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 Blue Moon Energy fails or refuses to furnish all or part of the requested information, Blue Moon Energy 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, Blue Moon Energy 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 Blue Moon Energy's response to Siting Board Staff's First Request for Information (Response to Staff's First Request), Item 16a.

- a. Confirm that the nonparticipating residences shown in the plot are the only residences within 500 feet that will experience construction activity sound levels

in excess of the Environmental Protection Agency's recommended 55 dBA daytime sound level.

b. If not, provide a listing of those residences that will experience construction activity sound levels in excess of 55 dBA and indicate those locations on the site plan map.

c. For any indicated residences in part b., explain what sound dampening techniques Blue Moon Energy will employ during pile driving activity as a mitigation measure.

2. Refer to Response to Staff's First Request, Item 40, and provide an estimated portion of the anticipated \$0.9 million in excise taxes, if any, that is expected to be paid to the Commonwealth of Kentucky.

3. Refer to the overall site plan and parcel map submitted as Exhibit A to the amended application, specifically parcel # 128-0000-013-00-000. The plan shows solar panels; however, this section of solar panels is separated from other sections by a delineated wetland or FEMA flood zone. Identify and explain any risk or danger of interconnection and all mitigating procedures for such risk or danger.

4. Refer to the amended application, Exhibit F, Hessler Associates, Inc.'s Sound Emissions Assessment dated October 11, 2021, and Plots 1 and 2 maps attached with its report. At the end of Hedges Lane, there is a nonparticipating residence; however, it does not appear on either map. In addition, refer to the amended application, Exhibit F, Cardno Inc.'s Construction Noise Assessment dated October 2021, 2-1: noise receptors map. The same nonparticipating residence does not appear on that illustrative

map either. Provide information on this residence regarding the expected noise effect, noise contours during construction and operation, the application of any noise ordinance, and mitigating procedure planned by Blue Moon Energy regarding the project's noise impact during and after the construction phase.

5. Refer to the amended application, Exhibit A, Schools and Local Parks within two miles of PV Panels (2-Mile Radius Map). Indicate the distances (in feet) from the project boundary to each residential neighborhood, park, hospital, church, and airport as provided in KRS 278.706(2)(b).

6. Disclose whether any environmental assessment study has been completed. If so, provide a copy.

7. Disclose whether a wetlands delineation study has been completed. If so, provide a copy.

8. The feasibility study provided as Exhibit D to the amended application is dated July 2018. Disclose whether any update has been completed. If so, provide a copy.

9. Explain and illustrate on a map any variations in site access roads from the original site plan submitted with the amended application.



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 APR 28 2022

cc: Parties of Record

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