

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF PINE GROVE)	
SOLAR, LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY 50-)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR)	2022-00262
GENERATING FACILITY IN MADISON COUNTY,)	
KENTUCKY PURSUANT TO KRS 278.700 AND)	
807 KAR 5:110)	

SITING BOARD STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO PINE GROVE SOLAR, LLC

Pine Grove Solar, LLC (Pine Grove Solar), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on May 12, 2023. The Siting Board directs Pine Grove Solar to the 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.

Pine Grove Solar shall make timely amendment to any prior response if Pine Grove Solar obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Pine Grove Solar fails or refuses to furnish all or part of the requested information, Pine Grove 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 and scanned 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, Pine Grove Solar shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the corporate structure of AES Corporation (AES). Include the places of AES Clean Energy, Sustainable Property Holdings LLC, and Pine Grove Solar within the corporate structure of AES.

2. List the membership interests in Pine Grove Solar, LLC.

3. Refer to the Application, Section 11 – Record of Environmental Violations. Provide the entities with an ownership interest in Pine Grove Solar that were referenced in the response. Explain where the entities with that ownership interest in Pine Grove Solar fit into the AES corporate structure.

4. Based on anticipated financing for the project, provide the entity Pine Grove Solar’s membership interest would be transferred to and how that entity fits within the AES corporate structure.

5. Provide the Large Generator Interconnection Agreement (LGIA) with Louisville Gas and Electric Company and Kentucky Utilities Company.



Linda C. Bridwell, PE
Executive Director
Public Service Commission *on behalf*
of the Kentucky State Board on
Generation and Transmission Siting
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DATED APR 28 2023

cc: Parties of Record

Case No. 2022-00262

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