

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 SECOND REQUEST FOR INFORMATION  
TO PINE GROVE SOLAR, LLC

Pine Grove Solar, LLC (Pine Grove Solar), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on March 17, 2023. The Siting Board directs Pine Grove 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 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

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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).

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 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 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. Refer to Pine Grove Solar's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 9. Provide a copy of the ground penetrating radar survey conducted for Hubbard Cemetery. Also provide any report from the cultural consultant.

2. Refer Pine Grove Solar's response to Staff's First Request, Item 27 and the Attachment 1-27, Table A-1, page 18. Noise Sensitive Receptors (NSR) 17, 18, 19, and 20 are within 200 feet of the project boundary. NRS 17 and 20 are within 100 feet of the project boundaries. Explain how these distances are consistent with the setbacks required in Condition 2 of the Certification of Land Use Restriction from Madison County.

3. Explain safe access and egress protocols for the project during the construction and operation phases including the design of perimeter safety fencing for the substation; access for workers on site during construction and operation; and access for emergency services throughout the life of the project.

4. Provide where employees will park during the construction of the project. Also, provide where delivers will be made on the site.

5. Explain what modification will be necessary at the intersection of Brassfield Road and Pine Grove Road to accommodate deliveries of heavy equipment, supplies, and materials to the site during construction. Include in the response the weight limits for Brassfield Road and Pine Grove Road from the Kentucky Department of Transportation.



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 MAR 03 2023

cc: Parties of Record

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