

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF BRIGHT)	
MOUNTAIN SOLAR, LLC FOR A CERTIFICATE)	
OF CONSTRUCTION FOR AN UP TO 80)	
MEGAWATT MERCHANT ELECTRIC SOLAR)	CASE NO.
GENERATING FACILITY AND RELATED)	2022-00274
NONREGULATED TRANSMISSION LINE OF)	
APPROXIMATELY 4 MILES IN PERRY COUNTY,)	
KENTUCKY PURSUANT TO KRS 278.700 AND)	
807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO BRIGHT MOUNTAIN SOLAR, LLC

Bright Mountain Solar, LLC (Bright Mountain), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 22, 2023. The Siting Board directs Bright Mountain 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

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).

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.

Bright Mountain shall make timely amendment to any prior response if Bright Mountain 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 Bright Mountain fails or refuses to furnish all or part of the requested information, Bright Mountain shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied or 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, Bright Mountain shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Describe any internal road improvements or maintenance that may occur prior to or during construction and operations of the project.

2. Provide an updated site plan indicating any changes since the Application was filed.

3. Refer to Bright Mountain's response to Siting Board Staff's First Request for Information (Staff's First Request), Items 11 and 12, Exhibits E Exhibit F. Confirm that the tables provide the cumulative noise levels, including both construction activities and ambient noise for these receptors. If the cumulative levels are not provided, submit revised tables with the cumulative noise levels added for each receptor.

4. Refer to Bright Mountain's response to Staff's First Request, Item 11, Attachment E, Receptor Distance Tables. Provide the business name and address for the non-residential structures identified as Receptor 11 and Receptor 162.

5. Refer to the Application, Tab 12, Site Assessment Report (SAR), Exhibit G, Figure 2-1. Receptor 13 and Receptor 101 are identified as commercial properties within 1,500 feet of the project. Provide the business name and address for these structures. Explain why they were not included in the list of non-residential structures Bright Mountain's response to Staff's First Request, Item 11 and Item 12.

6. Refer to Bright Mountain's response to Staff's First Request, Items 11 and 12, Attachment E and Attachment F. Explain why Receptor 6 (Pentecostal Church) and Receptor 200 (Wedding and Event Venue) were not included in the list of non-residential structures.

7. Refer to Bright Mountain's response to Staff's First Request, Items 11 and 12, Attachment E and Attachment F. Update the charts to include nonresidential receptors: 6, 13, 101, and 200; and, residential receptors: 89, 160, 161, 163, and 359.

8. Refer to the Application, Tab 12, SAR, Proposed Mitigation Measures, page 12. Also, refer to Bright Mountain's response to Staff's First Request, Item 40. Clarify if heavy construction activity is proposed between 7 a.m. through 9 a.m. or 7 a.m. through 7 p.m.

9. Provide the local roads that will be utilized for the construction of the transmission line. For each road, provide:

a. A description of current traffic and road conditions, including the number of lanes, presence of shoulders and bridges, speed limit, and weight limits.

b. Anticipated traffic impacts from transmission line construction activities, number of construction vehicle trips by type per day, load weights, and any stoppages that will be needed for construction.

c. Any road or traffic mitigation measures that will be implemented before, during, or after transmission line construction.

10. Provide any agreement with Perry County in relation to the transmission line.

11. Provide the distances between transmission line structures and the closest residence(s) to each structure along the transmission line route. Indicate whether the closest residences are participating landowners.

12. Refer to the Application, Tab 11, Socioeconomic Report. Also, refer to Bright Mountain's response to Staff's First Request, Items 56 and 57. Provide estimates of annual tax payments that would be made to Perry County, individual local entities within

the County, and to the Commonwealth of Kentucky in the absence of a Payment in Lieu of Taxes (PILOT) agreement.



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 DEC 06 2023

cc: Parties of Record

Case No. 2022-00274

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