

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	CASE NO.
FOR A SITE COMPATIBILITY CERTIFICATE FOR)	2023-00361
THE CONSTRUCTION OF A SOLAR FACILITY IN)	
MERCER COUNTY, KENTUCKY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY

Kentucky Utilities Company and Louisville Gas and Electric Company (collectively, LG&E/KU), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 19, 2024. The Commission directs LG&E/KU 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

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.

LG&E/KU shall make timely amendment to any prior response if LG&E/KU 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 LG&E/KU fails or refuses to furnish all or part of the requested information, LG&E/KU 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, LG&E/KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a schedule for the project, starting from the Commission's approval to the completion of the project, including the length of each construction phase. Include in the response when LG&E/KU believes peak construction will occur within the timeline.

2. Explain if an Engineering, Procurement, and Construction (EPC) firm has been selected for the project. Provide the request for proposal (RFP) for the EPC contractor.

3. Provide a one-page map showing the project and a 2-mile radius around the project. Include on the map any residential and nonresidential structures.

4. Provide a preliminary site layout. Include:

- a. Security fencing.
- b. Access Roads.
- c. Construction entrances.
- d. Panels.
- e. Inverters.
- f. Substation.
- g. Battery Energy Storage System (BESS).
- h. Transmission line.

5. Provide a detailed table listing all residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:

- a. The distance to the boundary line.
- b. The distance to the closest solar panel.
- c. The distance to the nearest inverter.
- d. The distance to the substation.

6. Provide a detailed table listing all non-residential structures located within 2,000 feet of the Project boundary line. For each structure provide:

- a. The distance to the boundary line.

- b. The distance to the closest solar panel.
 - c. The distance to the nearest inverter.
 - d. The distance to the substation.
- 7. Provide the Mercer County zoning and setback requirements for the project.
 - 8. Refer to the Application, Exhibit 1, Site Assessment Report (SAR) at 3-25.

Explain if additional vegetative screening is planned for the project. If no additional vegetative screening is planned, explain how the fencing will minimize impacts on the scenery.

9. Provide any communication with United States Fish and Wildlife regarding threatened and endangered species on the Project site.

10. Explain if a single-axis, tracking-style racking system or fixed-tilt racking system will be used for the solar array.

11. Provide any plans to coordinate with local landowners in case of complaints or other issues that might arise during construction or operation of the project.

12. Provide any communication with the Mercer County Road Department relating to traffic plans and mitigation measures. If no communication has been initiated, explain when that contact will occur.

13. Explain any specific restrictions that are proposed to be placed on the time of day or days of the week during which pile driving or other loud construction activities may take place. Include in the response the estimated length of time pile driving will occur during construction.

14. Describe any communication with landowners within 1,500 feet of the construction site boundaries.

15. Provide a table of noise receptors within 1,500 feet of the construction site boundaries with expected noise levels during construction and operation.
16. Provide a list of permits from other local, state, or federal agencies that have been or will be obtained prior to construction or operations.
17. Provide any geotechnical surveys done on the project area. If no geotechnical survey has been done, explain why not.
18. Provide the proposed setbacks for known or suspected karst formations within the project site.
19. Refer to the Application at page 41. Explain if the zoning change from agricultural to industrial has been completed. If not completed, provide when that process will be finished.
20. Provide the planned setbacks for the project.
21. Provide the cost benefit study for the project.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JAN 03 2024

cc: Parties of Record

*Honorable Allyson K Sturgeon
Managing Senior Counsel - Regulatory &
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Honorable Kendrick R Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KENTUCKY 40202-2828

*Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Robert Conroy
Vice President, State Regulation and Rates
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Sara Judd
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202