

David L. Hawkins

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September 8, 2025

RECEIVED

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**PUBLIC SERVICE
COMMISSION**

Kentucky State Board on Electric Generation and Transmission Siting

211 Sower Boulevard

P. O. Box 615

Frankfort, KY 40602

Re: Opposition to Wood Duck Solar, LLC Project (Case No. 2024-00337)

Dear Members of the Siting Board,

I am writing to you again to object to the wildly optimistic assumptions in Dr. Paul Coomes' Supplemental Responses to Siting Board Staff's Second Request for Information which was published on September 4, 2025 for the above referenced case. The assumptions he made result in conclusions that greatly exaggerate the purported economic benefits of the Wood Duck project.

His response to Request No. 23 states that 6.4 jobs will be lost because of the loss in agricultural employment due to the conversion of productive agricultural land for use as an industrial solar farm. In my prior communications with the Siting Board, I cited research from Columbia University stating that "The USDA figures show that one agricultural job is lost for every 9 acres taken out of production". Using Dr. Coomes' estimate of 1,688 acres results in job losses totaling 188 jobs. Could it be that IMPLAN doesn't account for job losses in the shrinking agricultural support economy? It strains credulity to think that such a massive loss of productive farmland would cost only 6 jobs.

In Dr. Coomes' supplemental response to Request No. 24, he assumes the entire 2,259 acres will be leased at \$750 per acre over the life of the project. First of all, Wood Duck is expected to only lease the amount of land necessary to house the project infrastructure. Second of all, the lease rate is expected to be \$600 per acre based on my conversations with Wood Duck when they wanted my farm to be part of the project. Both assumptions by Dr. Coomes grossly inflate the projected benefits of the project. Dr. Coomes and Wood Duck both know the actual acreage to be leased and the lease payment per acre.

You should require them to use actual numbers rather than assumptions so that a more accurate assessment can be made by the Siting Board.

The Supplemental Response to Request No. 25 has the same fatal error when Dr. Coomes assumes that the site's buildable area will be increased to 2,259 acres. We can assume that I could dunk a basketball without jumping if I were 10 feet tall, but the likelihood of me being 10 feet tall is nil. The likelihood of Wood Duck using and paying lease payments on the entire 2,259 acres is also nil.

In conclusion, the estimated net economic impact of the Wood Duck project tremendously overstates the benefits and minimizes the costs by using assumptions that are provably unrealistic. Dr. Coomes uses an average of 16 jobs for solar-related employment when 3 permanent jobs were projected in his earlier submissions. The loss in agricultural-related employment was minimized at 6 jobs when Columbia University research I referred to suggests that number to be at least 30 times higher.

Because of these fundamental weaknesses, the projected benefits of the economic impact of the Wood Duck project are massively overstated. The Siting Board should not rely on rosy assumptions for its decision-making. Instead, it should require Wood Duck to disclose the acreage and amount for the lease payments and get a more realistic picture of the costs and benefits of the project. When the true costs and benefits are weighed, I believe the Siting Board will see that the costs and risks to Barren Countians far outweigh the purported benefits.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read "David L. Hawkins", with a stylized, cursive script.

David L. Hawkins

enclosures

Wood Duck Solar LLC
Supplemental Responses to Siting Board Staff's Second Request for Information
Case No. 2024-00337

Request No. 23:

Refer to Application, Exhibit F, Economic Analysis, page 16. The discussion and calculations related to "Lost Economic Activity from Farming" appear to be based on 1,244 acres, generally the acreage required for Project infrastructure. Provide an analysis of the economic impacts to agriculture that reflects the entire Project site of 2,259 acres.

Original Response:

Analysis of this request is still in progress and will be provided to the Siting Board by September 4, 2025.

Supplemental Response:

See Application, Exhibit F at pages 8 and 17. Recently available satellite data reveal that of the entire 2,259 acres only 1,688 acres are currently in pasture or crop use. This is higher than the 1,244 acres assumed in my economic report. The revised estimated total annual lost agricultural economic activity in Barren County is shown in the table below.

Solar Site Agricultural Loss, Estimated County Impacts					
Impact	Employment	Labor Income	Value Added	Output	
Direct	4.7	\$138,511	\$233,434	\$536,200	
Indirect	1.1	\$45,278	\$63,281	\$125,070	
Induced	0.6	\$23,667	\$49,297	\$84,093	
Total	6.4	\$207,457	\$346,012	\$745,363	

Source: IMPLAN model of Barren County, using 2023 economic data.

Responding Witness: Dr. Paul Coomes

Wood Duck Solar LLC
Supplemental Responses to Siting Board Staff's Second Request for Information
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Request No. 24:

Refer to Application, Exhibit F, Economic Analysis, page 17. The discussion and calculations related to "New Income from Leasing Land to Solar Company" appear to be based on 1,244 acres, generally the acreage required for Project infrastructure. Provide an analysis of the economic impacts of landowner leases that reflects the entire Project site of 2,259 acres.

Original Response:

Analysis of this request is still in progress and will be provided to the Siting Board by September 4, 2025.

Supplemental Response:

Assuming the entire 2,259 acres will be leased at \$750 per acre over the life of the Project, the total annual positive economic impact in Barren County as shown in the table below.

A. Estimated Annual Impact of Lease Payments					
Impact		Employment	Labor Income	Value Added	Output
Direct		0.0	\$0	\$0	\$0
Indirect		0.0	\$0	\$0	\$0
Induced		7.3	\$317,500	\$632,759	\$1,081,432
Total		7.3	\$317,500	\$632,759	\$1,081,432

Source: IMPLAN model of Barren County, using 2023 economic data. All lease income simulated as increase in household income.

Assuming 2,259 instead of 1,244 acres would have no material effect to the property tax projection as shown in the original report. The tax attorney who did the projections had assumed 2,339 acres, that is, the whole site as determined at the time. (Property tax revenues rise when land is classified as commercial rather than agricultural. The increased property assessment from the development is based on the lease payment amounts per acre.).

Wood Duck Solar LLC
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Request No. 25:

Refer to Application, Exhibit F, Economic Analysis, page 24. Provide a revised analysis and table showing the estimated net annual Barren County impacts during operations that reflect the entire Project site of 2,259 acres.

Original Response:

Analysis of this request is still in progress and will be provided to the Siting Board by September 4, 2025.

Supplemental Response:

Assuming the site's buildable area will be increased to 2,259 acres, the net economic impact over three decades is shown in the table below. Compared to the original estimates based on 1,244 buildable acres, the net benefit increases by 49 job years (or 9 percent) and labor income increases by \$2,698,000 (or 8 percent). The projected increase in economic activity stems from a small additional loss of farmland offset by a large increase in land expected to generate lease payments to participating landowners.

In the below table, the solar-related employment and labor income figures for years 2 through 30 reflect the estimated economic activity generated from both operating the solar facility and through lease payments. The additional labor income more than compensates for the reduction in agricultural income on participating Project parcels.

Wood Duck Solar LLC
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Estimated Net Economic Impact Over Three Decades			
	Year 1 Construction	Years 2 through 30, annual average	Cumulative 30 years
Solar-related employment	302.7	16.0	765.6
Solar-related labor income	\$17,994,759	\$853,827	\$42,755,740
Agricultural-related employment	-6.4	-6.4	-192.4
Agricultural-related labor income	-\$207,457	-\$207,457	-\$6,223,698
Net employment	296.3	9.5	573.1
Net labor income	\$17,787,303	\$646,370	\$36,532,041

Responding Witness: Dr. Paul Coomes