

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF CLOVER)	
CREEK SOLAR PROJECT D/B/A NEW)	
FRONTIERS SOLAR PARK FOR A CERTIFICATE)	
OF CONSTRUCTION FOR AN APPROXIMATELY)	
100 MEGAWATT MERCHANT ELECTRIC SOLAR)	CASE NO.
GENERATING FACILITY AND NONREGULATED)	2024-00253
ELECTRIC TRANSMISSION LINE IN)	
BRECKINRIDGE COUNTY, KENTUCKY)	
PURSUANT TO KRS 278.700 AND 807 KAR)	
5:110)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION
TO CLOVER CREEK SOLAR PROJECT D/B/A NEW FRONTIERS SOLAR PARK

Clover Creek Solar Project, LLC d/b/a New Frontiers Solar Park, (Clover Creek Solar) 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 3, 2025. The Siting Board directs Clover Creek Solar 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

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).

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 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.

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

1. Submit a copy of the leases or purchase agreements, including options, separate agreements, or deeds which Clover Creek Solar has entered into in connection

with the proposed solar facility, including the agreements for each of the parcels of the project.

2. Detail any contracts by which Clover Creek Solar has paid, has negotiated to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near the project. Include the terms of the agreements and which properties are involved, in terms of distance, to the project boundaries.

3. Explain why Clover Creek Solar has chosen a site with so many non-contiguous parcels.

4. Explain how a non-contiguous Project site can be developed and function as single integrated Project.

5. Explain how power generated within the non-contiguous portions of the Project site will be delivered to the substation.

6. Explain whether the construction and operational entrances will be locked outside of normal working hours.

7. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, including the length of each construction phase. Include when the peak construction would occur within the timeline.

8. Provide what time of day construction, operation and maintenance activities will begin and end each day.

9. Provide a narrative description of the location of each laydown area to be used during construction.

10. Provide a narrative description of the location to each of the following site features:

- a. Each construction entrance.
- b. Each entrance to be used in operations.
- c. Operation & Maintenance (O&M) area.
- d. Each laydown area.

11. 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.

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

a. A description of any structure (barn, commercial building, warehouse, church, etc.).

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

13. Refer to the Application, Record of Environmental Violations at 12. Provide the entities with a direct ownership interest in Clover Creek Solar. Also provide the corporate structure of those entities.

14. Provide a list of permits that will be required from any other local, state, or federal agencies for the project. Include in the response the status of those permits.

15. Refer to the Site Assessment Report (SAR), Attachment A, Preliminary Site Layout. The map that is provided is not legible. Provide an updated site plan for the proposed project that is of sufficient quality. Separate the site plan into discrete project areas and file the documents separately so each one can be accessed and enlarged.

16. Refer to the SAR, Attachment A, Preliminary Site Layout. Provide a one-page site map that contains the locations water features, including rivers, streams, lakes, and ponds. Also include any known or suspected karst features.

17. Explain whether the perimeter security will be installed according to National Electrical Safety Code (NESC) standards. Include in the response whether the fencing will be installed before any electrical work begins.

18. Explain whether the substation have its own separate fencing and will it comply with NESC standards.

19. Provide the total length of cabling to be used in the projects' collection system.

20. List all churches or other religious facilities within a two-mile radius of the project. Provide the corresponding distances from the facility to the closest site boundary.

21. Provide any communication with any churches or other religious facilities regarding the project. Provide any concerns that were raised.

22. 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.

23. Explain whether a historical survey of the project has been conducted. If yes, provide a copy. If no, explain when that will occur.

24. Refer to SAR, Attachment G, Landscape Plan. In narrative form identify the seven historic structures in the landscape plan.

25. Provide any communication that has occurred with any schools within a two-mile radius of the project. Provide any communication and any concerns that were raised.

26. The proposed Project site sits in a karst prone region with high groundwater sensitivity levels. Provide any mitigation measures Clover Creek Solar will implement during construction and operations in response.

27. Provide the security measures for the O&M areas and substation within the project's boundaries.

28. Explain how Clover Creek Solar will coordinate with local law enforcement and fire services regarding security and emergency protocols during construction and operations.

29. Explain whether any existing structures on the project site will be demolished during construction.

30. Describe any utilities that will be required during construction or operations and what utility will provide the service.

31. Refer to SAR, Attachment A. Explain whether there will be vegetation clearing for construction. Provide in the response the number of acres that will be cleared and any permits that will be required.

32. Refer to SAR, Attachment A, Preliminary Site Layout. It appears not all proposed solar arrays have populated on the site plan. Provide an updated site plan showing all proposed solar arrays and any other updates.

33. Refer to SAR, Exhibit A, Preliminary Site Layout Plan. Explain if the medium voltage collection system will be underground, aboveground, or both. If the MV collection system will be underground and above ground, provide a map that shows which segments are underground and which segments are above ground.

34. Provide copies of any documents submitted to other agencies, other than what in the application.

35. Explain how the project has been designed to minimize the amount of tree clearing required.

36. Describe and provide information regarding what federal and state agencies that Clover Creek Solar is coordinating with in regard to the tree clearing strategy for protected bats.

37. Provide a wetland delineation report for the project. If one does not exist, provide when one will be produced.

38. Explain whether the Site Layout Plan will be modified after the Wetland Delineations are completed.

39. Explain whether Light Detection and Ranging (LiDAR) been utilized during research and evaluation of the project.

40. Explain in detail all cemetery facilities that may be affected by the project.

41. Provide a one-page directional map showing highlighted anticipated delivery routes for the project. Include on the map: access roads, access points, existing roads, bridges, electric generation components, and all structures within two miles of the project. Differentiate between roads and bridges that will and will not be used for deliveries.

42. Provide a map highlighting all construction entrances to the Project site and all roads proposed to be used.

43. Identify all bridges along all roads proposed to be used during the delivery/construction phase of the project. Identify the width and weight capacity of each bridge and any upgrades or repairs that will need to be made prior to the commencement of construction.

44. Explain the plan for repairing Project-related damage to any roadways or bridges.

45. Provide if Industrial Park Lane will be utilized during the delivery of the project substation.

46. Provide any sketches of the proposed transmission line support structure.

47. Explain how the proposed transmission route was determined.

48. Multiple transmission lines, owned by Big Rivers Electric Corporation (BREC) and Kentucky Utilities Company (KU), transect the project. Provide any communication with the two utilities regarding the project and any concerns that were raised.

49. Provide the rights-of-way for all transmission lines that transect any portion of the project site.

50. Detail any communication with the residences closest to the proposed substation location.

51. Explain whether vegetative clearing be required to accommodate the proposed 460 ft long transmission line. If yes, provide the anticipated acreage of vegetative clearing and any permits that will be required.

52. Refer to the Kentucky Geological Survey Oil and Gas Wells Search (KY Geode: KGS Oil and Gas Wells Search (uky.edu)).

a. Provide a map with all active and inactive oil or gas wells on the proposed site. Also include any gas- gathering pipelines associated with the wells.

b. Determine and confirm whether any of these wells are currently permitted and active.

c. Confirm whether the existence of oil and gas wells and pipelines will require adjustments to the proposed location of solar panels.

53. The proposed project site is transected by multiple pipelines, including: A Texas Gas 26" natural gas main pipeline, a Texas Gas 16" natural gas pipeline, and an Owensboro, Catlettsburg Crude 24" crude oil pipeline. Provide:

a. Any communication with the owners of these pipelines and any concerns that were raised.

b. The appropriate setbacks from each pipeline.

c. A map showing the location of all pipelines and their corresponding setbacks from all project components. Include on the map all electric generation components.

d. Provide how Clover Creek Solar manages to avoid all pipelines, especially with components such as the AC Collection system.

54. Provide a narrative description of where the solar meteorological stations will be located.

55. Explain whether Clover Creek Solar will pursue an Industrial Revenue Bond and Payment In Lieu of Taxes agreement with Breckinridge County. If yes, explain how that might change the cumulative tax revenues of the Project.

56. Explain whether Clover Creek Solar intends to hire as many local workers for the construction and operations phases of the project as possible, all other qualifications for the positions being equal. If confirmed, explain how Clover Creek Solar will ensure this occurs.

57. Refer to the Application, SAR, Attachment D, Noise Study. Provide a map that displays and labels each noise receptor listed in the report.

58. Refer to SAR, Attachment D, Appendix A. Provide a table in the format of Table A.1. for the Construction Sound Model results. Include the results for pile driving in the table.

59. Regarding construction noise, provide all mitigation measures considered for noise dampening during the construction phase.

60. Explain whether construction activities will occur sequentially, or concurrently across the Project site.

61. Detail any communications with members of the public, including neighboring landowners, regarding construction noise.

62. Provide a copy of the stormwater management plan for the project.

63. Confirm whether the site will be irrigated to promote vegetation.

64. Provide any geotechnical reports for the project.

65. Provide any historic or archeologic studies that have been planned or completed for the project site.

66. Provide the Construction Dust Control Plan for the project.
67. Provide a copy of the Groundwater Protection Plan.
68. Provide any communication with local emergency services on security and emergency protocols during construction and operations. If contact has not been made, explain when that contact will occur.
69. Provide who will control access to the site during construction and operations.
70. Refer to the SAR, Attachment D and H, Noise and Traffic Study.
 - a. Provide the weight limits of each local roadway to be used for construction traffic.
 - b. Provide the number of worker vehicles traveling to the site each day during construction.
 - c. Provide the number and approximate weight classes of the heavy and light duty trucks anticipated on site per day during the construction phase.
 - d. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.
71. Identify specific roadways used by heavy trucks, including for delivery of the transformer.
72. Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries. If yes, provide the expected locations, frequency, and length of those stoppages.

73. Provide any communications with Breckinridge County Road Department regarding permits or agreements necessary for the project. If no communication has been initiated, explain when that contact will occur.

74. Provide the number of miles between the Clover Creek Solar project and the project in Case No. 2020-00387.²

75. Provide any overlaps in the projected construction schedules of the projects in Breckinridge County.

76. Describe the cumulative effects on noise from the construction activities of the two projects, any steps to minimize these effects.

77. Describe the potential for cumulative effects on traffic and roadways from construction activities of the two projects, and any steps planned to minimize these effects.

78. Describe the potential cumulative effects on property values and land uses from the construction and operation of the two projects.

79. Provide any communication with the Kentucky Transportation Cabinet District Engineer regarding permits or agreements necessary for the project. If no communication has been initiated, explain when that contact will occur.

80. Provide information on the specifications, model number, and cutsheets of the photovoltaic (PV) cell/solar panels to be used.

81. Confirm whether the project will have a battery storage system. If a battery storage system is going to be utilized, provide the following:

² Case No. 2020-00387, *Electronic Application of Green River Solar, LLC for a Certificate of Construction for an Approximately 200 MW Merchant Facility in Breckinridge and Meade County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110.*

- a. Safety data sheets for the energy storage system.
- b. The environmental impact of the batter storage system.
- c. Expected life of the batteries.
- d. Method to dispose of batteries at the end of the useful life.
- e. How the battery storage system installation will comply with National

Fire Protection Association Standard 855.

82. Provide information on any fiber optic or communication network installed as a part of the project and any excavation that may be required for the installation.

83. Provide the planned time for construction to begin and end each day. Explain how Clover Creek Solar plans to mitigate arrivals and departures to minimize disruption to the area.

84. Provide any communication representatives of Clover Creek Solar have had with any of the property owners surrounding the project. Explain whether any changes have been made to the project based upon those concerns.



P.E.

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
Frankfort, KY 40602

DATED DEC 9 2024

cc: Parties of Record

*Gregory T Dutton
Frost Brown Todd, LLC
400 West Market Street
32nd Floor
Louisville, KENTUCKY 40202-3363

*Kathryn A Eckert
Frost Brown Todd, LLC
400 West Market Street
32nd Floor
Louisville, KENTUCKY 40202-3363

*Pierce T. Stevenson
Frost, Brown, Todd, LLC
250 West Main Street
Suite 2800
Lexington, KENTUCKY 40507