COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF WOOD DUCK SOLAR LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 100 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY AND NONREGULATED TRANSMISSION LINE IN BARREN COUNTY, KENTUCKY PURSUANT TO 278.700 AND 807 KAR 5:110	))))))))	CASE NO. 2024-00337

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION TO WOOD DUCK SOLAR LLC

Wood Duck Solar LLC (Wood Duck 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 July 28, 2025. The Siting Board directs Wood Duck Solar to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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.

Wood Duck Solar shall make timely amendment to any prior response if Wood Duck 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 Wood Duck Solar fails or refuses to furnish all or part of the requested information, Wood Duck 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, Wood Duck 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. Explain whether construction activities will occur sequentially or concurrently across the project site.

2. Provide a one-page site map that contains the locations of water features, including rivers, streams, lakes, and ponds. Also include any known or suspected karst features.

3. 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.

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

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

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

a. Each construction entrance.

b. Each entrance to be used in operations.

c. Operating & Maintenance area.

d. Meteorological station.

7. Explain how Wood Duck Solar will coordinate with local law enforcement and fire services regarding security and emergency protocols during construction and operations.

8. Provide a detailed table listing all residential structures located within 2,000 square feet of the project boundary line(s). The table must state the distance measurement in feet (not meters) for each structure, listed below:

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.

9. Provide a detailed table listing all non-residential structures located within 2,000 feet of the project boundary line(s). 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.

10. Provide a detailed description of different construction activities, including a construction timeline and schedule by activity, including development of the transmission line.

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

12. Describe any communication with the residents closest to the proposed substation location.

13. Provide the maximum expected load weights for each type of delivery truck, including cement and water trucks, heavy equipment, gravel for access roads, panels, inverters, and the transformer.

14. Identify the specific roadways used by heavy trucks, including for delivery of the transformer.

15. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.

16. Explain whether any oversize or overweight deliveries will require special permits from the Barren County Road Department or the Kentucky Department of Transportation. Explain the plan for repairing project-related damage to any roadways or bridges.

17. Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries for the project and/or for constructing the project transmission line. If yes, provide the expected location, frequency and length of those stoppages.

18. Provide a description of current traffic and road conditions, including number of lanes, presence of shoulders and/or bridges, speed and weight limits for each road proposed to be used during construction.

19. Provide the width and weight limit ratings of all bridges and culverts within a two-mile radius of the project.

20. Describe any repairs or upgrades that will need to be made to any bridges or culverts prior to the delivery and construction phase of the project.

21. 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.

22. Provide any communication with the Federal Aviation Administration (FAA) or the Kentucky Airport Zoning Commission (KAZC) regarding the project.

23. Provide any communication with the Glasgow Municipal Airport regarding the project.

24. 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 provide an explanation of 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 for each oil and gas wells and pipelines. If confirmed, explain the adjusted locations.

d. Confirm the ownership, diameter, and set-back requirements for each well or pipeline. Provide that information.

25. Confirm the location of all cemeteries within a two-mile radius of the project and explain whether the project will restrict access to them.

26. State the number of years it will take for planted trees and scrub to reach mature height.

27. Provide how many acres of vegetation, including trees, will be cleared during construction.

28. Provide a narrative description of any vegetative or tree clearing that will occur across the project. Include any permits that will be required.

29. Explain what factors are considered when deciding whether to remove forested areas from the project site.

30. Provide a map showing all planned areas of vegetative clearing. Include on the map satellite imagery, wetland features, and elevation contours.

31. Explain how Wood Duck Solar plans to mitigate flood risks within the site after vegetative clearing.

32. Refer to Application, Exhibit A, C203: Public Resources within 2 Miles of the Study Area. Provide an updated map which includes proposed solar array and associated equipment locations.

33. Provide copies of documents submitted to other agencies, other than what is provided in the application.

34. Confirm whether all fencing, installed according to National Electric Safety Code standards, will be installed prior to the commencement of any electrical work. If not confirmed, provide a timeline for the fencing installation.

35. Provide a parcel map for the proposed site. Include the parcel owner, acreage, whether they are participating or non-participating, parcel use, and all proposed project components presented in the site plan.

36. Describe the proposed 'six-foot game style fence' referenced in Exhibit H, the Site Assessment Report (SAR), page 3.

37. Refer to the Application, page 9. Confirm whether proximity to residential neighborhoods and individual residences was a factor in the site selection process. If confirmed, explain how the proximity to residential neighborhoods and individual residences were considered.

38. Explain why this site was selected given its proximity to multiple residential neighborhoods.

39. Provide details of the three historic structures and three historic cemeteries within 2000 ft of the project referenced in Exhibit H, SAR, page 18.

40. Refer to Application, Exhibit B, 2025 PIM and Public Notice Report, part 2, page 25 titled "Status of Wood Duck Project Studies". Provide copies of all completed studies, if not already included in the application.

41. Provide a parcel map for each residential neighborhood. Include each residence, the owner, and the distance to the nearest solar panel and fence. Use satellite imagery as the basemap.

42. Provide any communication that has occurred with Mammoth Cave National Park regarding the project. Include in the response all questions that were asked and all concerns that were raised.

43. Given the proposed project lies within the watershed basin of Mammoth Cave National Park, provide how the project will be designed to:

a. Abide by the Endangered Species Act which requires Mammoth Cave National Park to protect the endangered species in the park, on the surface, streams, and in subterrain waterways.

b. Avoid impacts to groundwater and cave systems.

c. Ensure the protection of the federally endangered Kentucky Cave Shrimp.

44. Explain how hydrological drainage into possible nearby cave systems will be prevented.

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

46. Confirm whether Wood Duck Solar still intends to pursue an Industrial Revenue Bond and Payment In Lieu of Taxes agreement with Barren County. If confirmed, provide a timeline for the execution of the agreements.

47. Explain whether Wood Duck 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 Wood Duck Solar intends to hire local workers, explain how it will ensure local hiring occurs, including any draft contract language and potential communications to the EPC contractor.

48. Provide the type of pile driving equipment that will be utilized at the time of construction.

49. Provide the method of pile driving that will be utilized at time of construction.

50. Provide a list of noise mitigation measures considered during the construction phase.

51. Refer to Application, Exhibit A, C203: Public Resources within 2 Miles of the Study Area. KRS 278.700(6) defines a "Residential neighborhood" as a "populated area of five (5) or more acres containing at least one (1) residential structure per acre." Explain how residential neighborhoods were identified in C203 and how that process complies with the statutory definition of residential neighborhood.

52. Explain whether any portion of the project site is located in Edmonson County.

53. Refer to Application, Exhibit H, SAR Narrative, page 1, which states that the "site consists mainly of 28 parcels secured from 15 landowners . . . ." Explain what is

meant by the term “mainly” and identify any and all portions of the project site which are comprised of other types of property.

54. Refer to Application, Exhibit H, SAR Narrative, page 1, which states that the “site consists mainly of 28 parcels secured from 15 landowners . . .” and to Attachment C (Parcel Map) which lists 27 parcels and 15 landowners. Identify the parcel number, owner, and acreage for the triangular parcel between parcels 19-6E and 32-20B, north of Cumberland Blvd. This parcel contains Project components in SAR Attachment A (Project Site Maps), Overall Site Plan map, and is not identified on the Parcel Map.

55. Describe the various utilities that will serve the project, as applicable (i.e. water, gas, sanitary sewer, electrical).

56. Refer to the SAR Attachment A, Project Site Maps, Overall Site Plan map. State the total number of site access entrances in use during the construction phase and provide a narrative description of each entrance location.

57. Refer to the SAR Attachment A, Project Site Maps, Overall Site Plan map. State the total number of site access entrances in use during the operations phase and provide a narrative description of each entrance location.

58. Refer to the SAR Attachment A, Project Site Maps, Overall Site Plan map. Confirm or correct our understanding that the project solar modules are located within 26 individually fenced clusters across the Project Site; 12 clusters located north of Cumberland Parkway; and 14 clusters located south of the Parkway (not including the two substation parcels). Please: (1) Label each fenced cluster of solar modules on the map with a number; (2) Identify the locations of all gates along the fencing surrounding these clusters on the map; (3) State the total number of gates.

59. Refer to the SAR Attachment A, Project Site Maps, Overall Site Plan map. The two clusters of solar modules furthest northwest and the large cluster south of Cumberland Parkway, bordered to the west by the transmission line, have access roads but no marked access entrances. Explain how these clusters will be accessed during project construction and operations. If these are mapping errors, provide a revised Overall Site Plan map.

60. Refer to SAR Attachment A, Project Site Maps, Overall Site Plan map. Twelve module clusters do not have either access roads or access entrances indicated. Explain how these clusters will be accessed during project construction and operations. If these are mapping errors, provide a revised Overall Site Plan map.

61. Refer to the SAR Attachment A, Project Site Maps, Overall Site Plan map. Confirm or explain if the red rectangles on the map labeled as “Electrical Equipment” in the legend refer to the project inverters.

62. Explain whether each access entrance available during the construction period and during the operational period will have its own security gate.

63. Provide a detailed description of construction activities, including a construction timeline and schedule by activity, accounting for construction of all project components. Explain any potential deviations to that schedule.

64. Provide the average number of construction workers on-site each day over the course of the construction period, accounting for construction of all project components.

65. Provide the number of construction workers on-site during the peak construction period and the number of days covering peak activity, accounting for construction of all project components.

66. Explain whether construction activities will take place seven days a week.

67. Refer to Application, Exhibit G, Property Value Impact Analysis, pages 33-40, which focus on solar projects located in Kentucky. The Glover Creek and Turkey Creek projects (noted on page 34) are both large projects (50 to 55 MWs) that have recently completed construction. Explain whether there have been any sales of homes or properties adjacent to either of those constructed projects that could be included in the analysis.

68. Explain whether there have been any sales of homes or properties adjacent to other recently constructed utility-scale solar projects in Kentucky that could be included in the analysis, including Unbridled Solar, Martin County Solar, or SR Russellville.

69. Explain whether an examination of changes in assessed valuation of properties adjacent to solar projects would be appropriate in cases where there are few or no home sales.

70. Provide details of any communications with the Barren County Road Department.

71. Explain whether any Project construction traffic or deliveries will utilize Edmonson County roads. If so, provide details of any communications with Edmonson County and/or the Edmonson County Road Department related to Project construction.

72. Provide the method and route for delivery of the project transformer.

73. Refer to SAR Attachment H, Traffic Impact Report, page 2. Provide the weight limits for Cumberland Pkwy, Oak Grove Church Rd, KY-255, and CR 1399.

74. Refer to the SAR Attachment H, Traffic Impact Report, page 2. Provide descriptions for the following Project area roadways: (1) C Bellamy Rd; (2) Millstown Rd; (3) Dripping Springs Rd; (4) Mayhew Rd; (5) KY-68/New Bowling Green Rd; (6) Waller Rd; (7) Merry Oaks-Railton Rd; (8) Red Cross Rd; and (9) Rick Road. Roadway descriptions should include AADT, number/width of travel lanes, shoulder width, speed limit, and weight limit.

75. Refer to the SAR Attachment H, Traffic Impact Report, Figure 1: Project Area. Provide the location and weight limit ratings for all bridges on roadways within the map area. Indicate which bridges will or may be used by project construction traffic.

76. Refer to the SAR Attachment H, Traffic Impact Report, Figure 1: Project Area. Provide the location and weight limit ratings for any railroad crossing on roadways within the map area. Indicate which crossings will or may be used by project construction traffic.

77. Provide the average daily number of construction vehicles accessing the site, by vehicle type -- i.e., worker vehicles, delivery trucks, water trucks (if utilized).

78. Provide the peak daily number of construction vehicles accessing the site, by vehicle type -- i.e., worker vehicles, delivery trucks, cement trucks, water trucks (if utilized).

79. Provide the maximum expected weights for each type of delivery truck, including water trucks (if utilized).

80. Provide the maximum expected load weights for each type of delivery, including cement and water trucks (if utilized), heavy equipment, gravel for access roads, panels, inverters, and the transformer.

81. Explain whether any improvements to roadways in the Project area will be necessary prior to construction.

82. Explain the plan for repairing Project-related damage to any roadways, railway crossings, or bridges.

83. Explain any specific traffic management strategies to be employed during construction.

84. 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.

85. If applicable, describe odor impacts from diesel fumes or other sources from construction vehicles that may be noticeable to nearby residents.

86. Indicate whether the Project site will be irrigated after construction to promote vegetation growth and reduce potential erosion.

87. Refer to the SAR Attachment D, Sound Study, Figure 4 and Appendix A. Provide a similar noise contour map and a sound model results table for these noise receptors during construction, including the dbA Leq levels for multiple pieces of construction equipment operating simultaneously, with and without pile driving.

88. Refer to the SAR Attachment D, Sound Study, Table 2. Provide the types of construction equipment that will be used for "trenching and installation of the

underground electrical collection system" at the substation. Update Table 2 to include this equipment, as necessary.

89. Provide the existing daytime ambient sound level(s) for the project area (dbA).

90. Explain whether a plan to coordinate construction activities around the schedules of local churches has been or will be developed. Provide that plan, if developed.

91. Provide cumulative operation noise levels at each non-residential receptor within 2,000 feet of the Project, to account for the ambient noise level and operating noise levels.

92. Explain whether any measures will be taken to reduce construction-related noise emissions and impacts for nearby residents during construction.

93. Refer to the SAR, Attachment E, Visual Resource Assessment. Table 3-3 and the accompanying Figure 3-2 indicate a total of 2 churches within a 5-mile radius of the project. However, Figure C203 included in Attachment A, Project Site Maps, appears to indicate six churches within a 2-mile buffer. Confirm the number of churches within each buffer.

94. Refer to the SAR, Attachment E, Visual Resource Assessment. Explain why residences are not included as visually sensitive resources.

95. Refer to the SAR, Attachment E, Visual Resource Assessment. Explain how the visual simulation locations were chosen. Explain why no visual simulation location is located near the substation site.

96. Describe the physical characteristics of the O&M building, i.e., footprint acreage, height.

97. Describe the physical characteristics of the 500-foot transmission line, i.e., height of poles, number of poles.

98. Refer to the SAR, Attachment G, Landscape Plan. Explain how the specific locations identified for vegetative screening were chosen.

99. Provide any available transcripts of the public meetings. Provide any written or oral comments offered by the public or government agencies, from public meetings or through other avenues, including the project website.

100. Explain any plans to coordinate with local landowners or others in case of complaints or other issues that might arise during the course of construction or operations.

101. Refer to Application, Exhibit F, Economic Impact Analysis Report. Describe the portion of the total $130 million dollar investment that might be spent in the local area (Barren and surrounding counties).

102. Refer to Application, Exhibit F, Economic Impact Analysis Report. Explain whether the estimated 240 construction workers are anticipated to be hired from within Barren County and surrounding counties (consistent with the patterns in the table on page 6).

103. Refer to Application, Exhibit F, Economic Impact Analysis Report, page 11. Explain whether new construction related labor compensation is $17.7 million (as in the text) or $13.0 million (as in the table).

104. Refer to Application, Exhibit F, Economic Impact Analysis Report, page 24. Explain the differences between the Year 1 solar-related employment and labor income in this table (299.4 people and $17.9 M) as compared to the data in the table on page 11 (295.4 people and $13.0 M).

105. Refer to Application, Exhibit F, Economic Impact Analysis Report, page 24. Provide the estimated net economic impact over the entire life of the project, estimated to be approximately 40 years.

106. Refer to Application, Section X, Effect on Local and Regional Economies. Explain the statement indicating 323 jobs and $20.2 million in new labor compensation during construction, given the different data in the table on page 11 of the Economic Impact Analysis Report.

107. Provide a list of all permits required from other local, state or federal agencies for the construction and operation of the project, indicating the specific agency, permit type and applicability to the Project.

108. Provide any materials submitted to other permitting agencies related to this Project.

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 JUL 14 2025

cc: Parties of Record

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

*Joye Beth Spinks
English, Lucas, Priest & Owsley
1101 College Street
P. O. BOX 770
Bowling Green, KY 42101

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

*Honorable Harold Mac Johns
English, Lucas, Priest & Owsley, LLP
12 Public Square
P.O. Box 746
Elkton, KY 42220

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