

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF PIKE COUNTY)	
SOLAR PROJECT, LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN UP TO 100)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR)	2024-00105
GENERATING FACILITY IN PIKE COUNTY,)	
KENTUCKY)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO PIKE COUNTY SOLAR PROJECT, LLC

Pike County Solar Project, LLC (Pike County 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 August 27, 2024. The Siting Board directs Pike County 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 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.

Pike County Solar shall make timely amendment to any prior response if Pike County 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 Pike County Solar fails or refuses to furnish all or part of the requested information, Pike County 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, Pike County 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. Refer to the Application, Exhibit A, Project Site Map. Provide an updated site plan that shows the location of:
 - a. Parcel boundaries.
 - b. Perimeter fencing.

- c. Access roads.
- d. Access points.
- e. Substation.
- f. Battery energy storage system (BESS).

2. Refer to Applicant's responses to Siting Board Staff's First Request for Information (Staff's First Request), Items 19–25. Explain the phrase "separate forthcoming permitting process for the transmission line" for each response.

3. Refer to Applicant's responses to Staff's First Request, Items 19–25. Confirm the following for each of the responses:

a. A separate permitting process for the project transmission line is not underway.

b. The applicant is in active negotiations with potential participating landowners regarding the transmission line.

c. The transmission line route will be determined by landowner interest and willingness to participate, with the shorter tie-in route requiring the participation of three landowners and the longer tie-in route requiring the participation of five landowners.

d. Two landowner agreements are in currently place for both route options; and the remaining agreements are not expected to be finalized in the next few weeks.

4. Confirm the following:

a. After the permit and easements for the proposed project transmission line are obtained, the permits and easements will be transferred to Louisville Gas and Electric Company (LG&E) or Kentucky Utilities Company (KU). If confirmed,

specify which utility will be the permit holder and lessee. If not confirmed, explain whether and when a transfer of interest will occur.

b. The utility will construct the transmission line. If not confirmed, explain why not.

c. The utility will extend a transmission line to the project site and construct a switching station adjacent to the project substation. If not confirmed, explain who will connect the transmission line to and construct the switching station.

5. Refer to Applicant's response to Staff's First Request, Item 3.

a. Explain what construction activities are included in Pier Installation (5 months duration).

b. Explain the difference between that timeframe and the anticipated 40-day timeline for pile driving indicated in Tab 12, Exhibit D (Acoustic Assessment).

6. State whether any construction activities would occur on Sundays. If yes, state the specific hours of the day during which construction might take place.

7. Refer to Applicant's response to Staff's First Request, Item 35, and Exhibit E, Traffic Impact Study. Provide the following data for Ford Mountain Road and Right Fork of Brushy Road:

a. Existing conditions.

b. Existing traffic volumes.

c. Weight limit ratings.

d. Project construction trip generation.

e. Projected traffic analysis during Project construction.

8. Provide the percentage of construction traffic that will utilize each of the four site entrances. Include separate figures for delivery traffic and commuting worker traffic, by entrance.

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

10. Provide the maximum expected load weights for each type of delivery truck, identified by type of truck, including cement trucks, water trucks, tractor trailers, or other types of general delivery trucks.

11. Provide the actual construction traffic and delivery truck data (by type and by month) from the Applicant's solar project in Martin County as indicated would be provided during the site visit.

12. State the total number of separate parcels of solar panels (i.e., groupings of solar panels within separate gated and fenced areas) across the project site. As part of the response, number the separate parcel areas on a map for reference.

13. Refer to Applicant's response to Staff's First Request, Item 41. Provide an updated response that reflects the change in the transformer delivery route as discussed during the site visit.

14. Explain whether any traffic stoppages along Brushy Road, Ford Mountain Road, Right Fork of Brushy Road, and Meta Highway will be necessary to accommodate large truck deliveries to the project site. If yes, provide the expected locations, frequency and length of those stoppages.

15. Refer to Applicant's response to the Staff's First Request, Item 39. Provide an updated estimate of the average number of commuter vehicles traveling to the site, or documentation to support the assumption that construction workers will carpool to the project site at the rate of three to four workers per vehicle each day.

16. Refer to Applicant's response to the Staff's First Request, Item 39. Provide an updated estimate of the peak number of commuter vehicles traveling to the site, or documentation to support the assumption that construction workers will carpool to the project site at the rate of three to four workers per vehicle each day.

17. Refer to Applicant's response to Staff's First Request, Attachment C, Items 9–10. The table provided lists the distances between homes and project features only for residences within each identified neighborhood. Provide the same data for all other individual residential and non-residential structures within 2,000 feet of the project boundary line.

18. Provide a table with the expected cumulative noise level (inclusive of ambient noise) during pile driving for each residence or business within 1,500 feet of the project boundary.

19. Confirm that meteorological stations will be placed throughout the project site, as indicated during the site visit. If confirmed, provide the number and location(s) of the meteorological stations. If not confirmed, explain why not.

20. Refer to Applicant's response to Staff's First Request, Item 58, and Attachment H.

a. Highlight the 14 residences that would have a view of the project on the figure in Attachment H.

b. Confirm that no other residences shown in the figure would have a view of any Project features. If not, confirmed explain why not.

21. Refer to Applicant's response to Staff's First Request, Item 58. For the 14 residences that would have a view of project facilities, state what type(s) of infrastructure would be in view for each individual residence.

22. Refer to Applicant's response to Staff's First Request, Item 58. For each residence that would have a view of project panels, state whether glare would be an issue for each residence.

23. Based on discussion that occurred at the site visit, explain whether vegetative screening, berms, or another form of screening would be developed along any roadways or other areas to reduce glare or other visual impacts of the project. If yes, indicate the locations on a map where screening would be added, along with a description of the vegetation to be planted and a plan for vegetation management. If not, explain why not.

24. Explain whether any special equipment or construction methods would be necessary to drill into the rocky ground on the project site.

25. Refer to Applicant's response to Staff's First Request, Item 78. Explain how the identified point of contact for complaints or concerns will be provided to local landowners.

26. Confirm that the reclamation permitting process to change the post-mine use of the land to industrial or commercial use and subsequent site reclamation activities will be completed within 6 to 8 months. If not confirmed, explain why not.

27. Confirm that solar facility construction work can occur in certain areas of the project site while reclamation is being completed in other areas.

28. Refer to Applicant's response to Staff's First Request, Attachment K, Item 84. Confirm that all the federal, state, and Pike County permits and consultations listed in the Permitting Table are specifically applicable to the Pike County Solar Project. If not, provide a revised table of the permits applicable to the project.

29. Refer to Staff's First Request, Attachment K, Item 84. Indicate what tribal lands the project is located on or adjacent to.

30. Refer to the Application, Tab 10, Economic Impact Report. Explain whether application of data about construction costs, including labor costs and local expenditures, and estimates of number of construction workers, including local hires, from the nearby Martin County Solar Project could result in more accurate estimates of the economic benefits of the Pike County Project within Pike County and the Commonwealth, as compared to the application of data from the 2014 study of solar facilities in California. If yes, provide revised estimates of the construction workforce, labor compensation, local expenditures and economic activity for the Pike County Solar Project.

31. Refer to the Application, Tab 10, Economic Impact Report. Provide estimates of annual and total (over the life of the project) property taxes that will be paid to Pike County and, separately, to the Commonwealth of Kentucky.

32. Refer to the Application, Tab 10, Economic Impact Report. Provide estimates of annual and total (over the life of the project) taxes that will be paid to the Commonwealth of Kentucky related to the value of manufacturing machinery.

33. Refer to the Application, Tab 10, Economic Impact Report. Provide an estimate of the amount of the project investment:

- a. In Pike County;
- b. Total within Kentucky; and
- c. Total outside Kentucky.

34. Refer to the Application, Tab 10, Economic Impact Report. Explain the relatively high salary level assumed for the three permanent operation jobs as compared to salary levels for other, similar type jobs in Pike County.

35. Provide an updated delivery plan for the construction phase of the project. Include roads and bridges that will be used and what equipment will be delivered along which routes and through which access points.

36. Provide any updates to planned delivery times given proposed delivery routes is in close proximity to John's Creek Elementary School.

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

38. Provide any existing agreements regarding the proposed transmission line, including but not limited to transfer of ownership, permits, or leases.

39. Provide a map showing all possible transmission line routes. Use satellite imagery as the basemap.

40. Provide any updates regarding easement agreements for the proposed transmission line including but not limited to copies of all signed agreements.

41. Provide any communication that has occurred with Meta Baptist Church regarding the project.

42. Provide the days of the week and times services are held for Meta Baptist Church.

43. Refer to Applicant's response to Staff's First Request, Item 8. Provide the local departments that will be contacted regarding security and emergency protocols during construction and operations.

44. Explain what racking technology will be used to minimize soil movement during construction and operations.

45. Provide the bonding company that will be responsible for the reclamation of the site.

46. Describe, in detail, the Kentucky Energy and Environment Cabinet's permitting process and the requirements that will have to be fulfilled for a land use permit for the proposed Project.

47. Refer to Applicant's response to Staff's First Request, Items 18–25. Provide any updated information for each request.

48. Refer to Applicant's response to Staff's First Request, Items 48–49. Provide any updated information for each request.

49. Explain whether a request has been made to the U.S. Army Corps of Engineers for a wetland delineation report. If not, provide a date for which it will be made.

50. In a map, provide the following and color code the response for each neighborhood the participating homeowners and include a legend:

- a. Identify each neighborhood and each of the noise receptors that are homes;
- b. The homes which are participating landowners; and

c. Indicate whether the participating homeowner is a lessor and which lease is applicable.

51. Identify the company that will employ the individuals that are, or will be, responsible for ensuring compliance with the statements in the application and any conditions imposed by the Siting Board.

52. Provide the entire corporate structure, or membership interests, of Pike County Solar.

53. Provide the entire corporate structure of Savion, LLC (Savion), including its parents company.

54. See the Application, Tab 11, Environmental Violation Record. Provide the entities with an ownership interest in Pike County Solar that were referenced as not having any environmental violations.

55. Explain whether Pike County Solar intends to hire as many local workers for the construction and operation phases of the project as possible, all other qualifications for the positions being equal.

56. Explain whether a complaint resolution program is going to be created for this project. If so, explain in detail the program.



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 AUG 13 2024

cc: Parties of Record

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