

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF STMO BN, LLC )	
(STARFIRE) FOR A CERTIFICATE OF )	
CONSTRUCTION FOR AN APPROXIMATELY )	
210 MEGAWATT MERCHANT SOLAR ELECTRIC )	CASE NO.
GENERATING FACILITY IN KNOTT, BREATHITT, )	2024-00255
AND PERRY COUNTIES, KENTUCKY )	
PURSUANT TO KRS 278.700 AND 807 KAR )	
5:110 )	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION  
TO STMO BN, LLC

STMO BN, LLC (Starfire), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 31, 2025. The Siting Board directs Starfire to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

Starfire shall make timely amendment to any prior response if Starfire 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 Starfire fails or refuses to furnish all or part of the requested information, Starfire 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, Starfire 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 the width and weight limit ratings of all roads proposed to be used during the delivery and construction phase of the project.
2. Provide the current condition of all roads expected to be used during the delivery and construction phase of the project.

3. Provide the width and weight limit ratings of all bridges and culverts within a two-mile radius of the project.
4. Describe any repairs or upgrades that will need to be made to any roads prior to the delivery and construction phase of the project.
5. 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.
6. 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.
7. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.
8. Explain whether any oversize or overweight deliveries will require special permits from the County Road Departments or the Kentucky Department of Transportation.
9. 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 locations, frequency, and length of those stoppages.
10. 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.
11. Provide a narrative description of all proposed vegetative clearing. Include in the response the total anticipated acreage of vegetative clearing.

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

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

14. Explain how Starfire will address the possibility of displaced wildlife as a result of vegetative clearing.

15. 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.

16. 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.

17. Refer to the Kentucky Geological Survey Oil and Gas Wells Search (<https://kgs.uky.edu/kygeode/services/oilgas/>).

a. File a map identifying 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 explain whether any of these wells are currently permitted and active. If active, identify the wells as such on the map provided in response to Item 17(a).

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

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

19. Explain if the medium voltage (MV) collection system will be underground, above ground, 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.

20. 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. Include in the response a diagram or map depicting the location of the fiber optic or communication network for proposed project.

21. Explain whether construction activities will occur sequentially or concurrently across the project site.

22. Explain how the proposed transmission route was determined.

23. Identify on a map 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.

24. Provide any communication with any churches or other religious facilities regarding the project. Provide a summary of any concerns that were raised.

25. Identify all cemeteries located within a two-mile radius of the project on a map and identify if the project will restrict access to them in any way.

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

27. 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.

28. 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.

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

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

31. Explain if an Engineering, Procurement, and Construction (EPC) firm has been selected for the project. Include in the response the request for proposal (RFP) for the EPC contractor.

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

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

- a. Safety data sheets for the energy storage system.
- b. The environmental impact of the battery 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.

34. Provide a narrative description of the proposed transmission line route and any alternate routes, including the number of poles to be installed, the height of the poles and the length and width of the transmission line right-of-way.

35. Provide a map showing the proposed transmission line route, the right-of-way, and the existing property lines that the proposed transmission line is proposed to cross. Include in the response a list of parcel numbers and corresponding property owner names.

36. Explain how Starfire proposes to minimize significant adverse impact to the scenic assets of Kentucky with the proposed route of the transmission line.

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

38. Explain how the proposed transmission route was determined.

39. Identify the gas pipeline included in the legend of the site plan. In the response include the owner of the pipe, diameter of the pipe, and provide a map showing its location within the project boundary.

40. Explain how Starfire will coordinate with local law enforcement and fire services regarding security and emergency protocols during construction and operations.

41. Provide what departments Starfire will coordinate with regarding security and emergency protocols and training during construction and operations.
42. Provide a brief narrative history of the previously used surface mine.
43. Given its prior use as a surface mining site, provide the reclamation status of the site.
44. Given the site was previously used as a surface mine, provide any steps Starfire will take to remediate the site and any special preparations to minimize pollutant discharge.
45. Explain how the project will be designed to avoid impacts to Waters of the United States (WOTUS) delineated onsite.
46. Provide details of the “UK Tree Study” shown on the site plan and what affect it will have on the project.
47. Describe the proposed fencing, including how it will accommodate local wildlife.
48. Provide a Cumulative Environmental Assessment (CEA) study for the project.
49. Provide any Geotechnical Desktop studies that exist for the project.
50. Provide a Phase 1 Environmental Site Assessment report for the project.
51. Provide a Stream and Wetland Delineation study for the project.
52. Provide any interconnection agreements that exist in relation to the project.
53. Provide information regarding any public meetings that have occurred regarding the project. Include in the response any materials that were provided, sign-in sheets, and a summary of public comments that were made.



54. Provide the type of pile driving equipment that will be utilized during the construction phase of the project.

55. Provide the method of pile driving that will be utilized during the construction phase of the project.

56. Provide a detailed table outlining the anticipated noise levels during the construction phase of the project for each residential structure within 2,000 feet. Include noise levels for pile driving and the number of feet from each structure.

57. Provide a detailed table outlining the anticipated noise levels during the construction phase of the project for each non-residential structure within 2,000 feet. Include noise levels for pile driving and the number of feet from each structure.

58. Provide a detailed table outlining the anticipated noise levels during the operational phase of the project for each residential structure within 2,000 feet. Include noise levels for inverters, panels, and substations, and the number of feet from each structure.

59. Provide a detailed table outlining the anticipated noise levels during the operational phase of the project for each non-residential structure within 2,000 feet. Include noise levels for inverters, transformers, and substations, and the number of feet from each structure.

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

61. Provide a detailed table outlining the anticipated noise levels of all construction equipment to be used during the construction phase of the project.

62. Refer to Application Exhibit A, "Neighborhood Map." Supplement this exhibit with the following information with adequate resolution for review:

- a. Site access road(s) from nearest public roadways and locations of guard house(s) referenced in the Site Assessment Report (SAR).
- b. Location of proposed project substation.
- c. Location of proposed transmission line to point of interconnection.

63. Identify the distance of the proposed transmission line from the project boundary to the point of interconnection.

64. Provide an estimated breakdown of the 1,980 acre project site and the 1,385 acre footprint within the project fence line by county.

65. Refer to SAR, page 2, paragraph 4. The SAR states that there will be a guard house at the base of the main access road leading up to the site. Provide additional information regarding the hours and days of the week that the guard house is expected to be manned. Include a breakdown for the construction and operational phase of the project.

66. Refer to SAR, page 2, paragraph 4. The SAR states that there will be separate access gates to each of the array areas. Explain whether each of the array areas will be individually fenced. If so, describe the hours during which those gates will be locked during the construction and operational phase of the project.

67. Refer to SAR, Attachment H, "Traffic Study." Provide a timeline for the construction phase of the project.

68. Refer to SAR, Attachment H, "Traffic Study." Provide a narrative summary of any contact that Starfire has had with the following parties regarding the proposed project, traffic impacts, heavy deliveries to the site, or mitigation measures:

- a. Kentucky Transportation Cabinet District Engineer;
- b. Knott County Road Department;
- c. Breathitt County Road Department;
- d. Perry County Road Departments.



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 MAR 14 2025

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

\*Zachary Weinberg  
38 Eagles Nest  
Emmalena, KENTUCKY 41740