

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

In the Matter of:

ELECTRONIC APPLICATION OF EXIE SOLAR,	)	
LLC FOR A CERTIFICATE OF CONSTRUCTION	)	
FOR AN APPROXIMATELY 110 MEGAWATT	)	CASE NO.
MERCHANT ELECTRIC SOLAR GENERATING	)	2025-00151
FACILITY AND NONREGULATED ELECTRIC	)	
TRANSMISSION LINE IN GREEN COUNTY,	)	
KENTUCKY	)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO EXIE SOLAR LLC

Exie Solar, LLC (Exie 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 November 9, 2025. The Siting Board directs Exie 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 governmental agency, be accompanied by a signed certification of the preparer or 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).

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.

Exie Solar shall make timely amendment to any prior response if Exie 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 Exie Solar fails or refuses to furnish all or part of the requested information, Exie 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, Exie 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 Exie Solar's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 6. Provide, in detail, more information regarding the commercial and recreational uses of those two properties that abut the proposed Exie Solar project.

2. Provide the distance the transmission line and the boundary of the right-of-way (ROW), individually, will be located to the closest nonparticipating landowner.
3. Provide, in detail, the communication that Exie Solar has had with the closest nonparticipating landowner from the transmission line or the ROW.
4. Refer to Staff's First Request, Item 20. Provide the specification sheets or other source information documenting noise emission estimates for the solar post pile driver likely to be used for the Exie project, such as the Everstar HXR5 or HXR6 Solar Pile Driver or the Vermeer PD10.
5. Provide the specification sheets or other source information documenting noise emission estimates for the rock drills anticipated to be used during construction.
6. Refer to Exie Solar's response to Staff's First Request, Item 80.
 - a. Confirm whether the update to Table 1 (Peak Hourly Traffic column) refers to existing peak traffic or to peak traffic modeled for the proposed Exie construction period.
 - b. If the updated Peak Hourly Traffic column refers only to existing conditions, provide quantitative results of expected traffic impacts (from worker vehicles and deliveries to site) during the construction of the proposed Exie project, such as maximum ADT or peak daily traffic (e.g., for the busiest phase of project construction).
7. Refer to Exie Solar's response to Staff's First Request, Item 97. Provide a map of the residential structures that may have a view of any portion of the Project. Differentiate between participating and nonparticipating residences.
8. Provide a map showing all planned areas of vegetative clearing. Include on the map satellite imagery, wetland features, and elevation contours.

9. Confirm whether all fencing, installed according to National Electrical Safety Code (NESC) standards, will be installed prior to the commencement of any electrical work.

10. Provide information on all natural gas pipelines that intersect the project. Include in the response the owner, pipe diameter, status, and setback requirements.

11. Provide any communication with representatives of Horseshoe Bend regarding the proximity between the two projects. Include in the response any concerns that were raised.

12. Describe the cumulative effects on noise from the construction activities of the two projects (Exie Solar and Horseshoe Bend)² and describe any steps to minimize these effects.

13. Describe the potential for cumulative effects on traffic and roadways from construction activities of Exie Solar and Horseshoe Bend, and any steps planned to minimize these effects.

14. Describe the potential cumulative effects on property values and land uses from the construction and operation of Exie Solar and Horseshoe Bend.

15. Refer to SAR, Attachment F, Property Value Impact Report. Explain whether the report considered the effects of adjoining solar projects Exie and Horseshoe Bend during its calculations and findings or just the Exie Solar Project.

16. Refer to Appendix B in the final Order in Case No. 2020-00190. After overlapping the boundaries from maps submitted in final Order, Appendix B, Case No.

² Case No. 2020-00190, *Electronic Application of Horseshoe Bend Solar, LLC For a Construction Certificate To Construct An Approximately 60 Megawatt Merchant Electric Solar Generating Facility in Green County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110*.

2020-00190, and the SAR, Attachment B, Preliminary Site Plan in Case No. 2025-00151, Exie Solar, it appears there are two overlaps in the two project boundaries in the northeastern area of Exie Solar's proposed site between Lone Oak Road and DAR Cemetery Road. Provide the following:

a. Explain if any communication has occurred with representatives of the Horseshoe Bend project regarding the boundaries of both projects.

b. An updated site plan to reflect any changes to the proposed project boundary.

17. Explain why Exie Solar decided to adjoin its project to the Horseshoe Bend project.

18. The project is in a region with a groundwater sensitivity rating of 5, the highest possible rating. Explain how Exie Solar will consider groundwater sensitivity during construction and what mitigation measures will be implemented as a result.

19. The proposed substation site, switchyard site, BESS site, and gen-tie corridor all sit in an area where karst and especially sinkholes are prevalent. Provide the following:

a. Whether relocation of these sites is possible or feasible.

b. Explain the mitigation measures Exie Solar will implement during construction to combat karst should these sites be used.

c. Explain the foundations each site will have.

20. Refer to the map provided in Exie Solar's response to Staff's First Request, Item 27. Add to the map the proposed substation, battery energy storage system (BESS)

facility, O&M building, and transmission line route locations. Also include proposed solar array areas.

21. Describe the agricultural-style fence. In the response, include a preliminary design.

22. Explain whether the agricultural-style fence will include barbed wire.

23. Provide the number of gates that will be along the fenced perimeter.

24. Provide a table showing the distance between transmission line structures (poles) and nearby residences, for the proposed route, the ROW, and the alternate route and ROW.

25. State the number of individual parcels and landowners participating in the Project, including the transmission line.

26. Provide the name and business who will perform inspections of the BESS facility prior to and during operations. Include in the response the frequency of inspections and details of the inspection criteria.

27. All other qualifications for the positions being equal, explain whether Exie Solar intends to hire as many local workers for the construction and operation phases of the project as possible. If so, include how Exie Solar intends to accomplish that.

28. Explain whether a power purchase agreement has been finalized. If not, provide a timeline for drafting and finalizing a power purchase agreement.

29. Provide any updates to vegetative screening plans.

30. Provide the name of the company that will employ the individuals that are or will be responsible for ensuring compliance with the statements in the Application, as

well as any conditions imposed by the Siting Board during construction and operation of the project.

31. Explain any commitments regarding infrastructure removal or land restoration during decommissioning, including in the landowner lease agreements.

32. 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.

33. Provide the average number of construction workers on-site each day over the course of the construction period.

34. 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, tractor trailers, or other types of general delivery trucks if utilized).

35. Refer to Staff's First Request, Item 102. Provide the number distance between the boundaries of the Exie Solar project and Horseshoe Bend Solar, LLC, project approved in Case No. 2020-00190, at the closest point.

36. Provide any environmental studies that have been completed including a Phase I Environmental Assessment.

37. Refer to the October 14, 2025 Motion for Deviation. Explain how Exie Solar determined that the residences along Liletown Road are not a residential neighborhood as defined by KRS 278.700(6).

38. Explain the justification for requesting a deviation from the 2,000-foot setback requirement for residential neighborhoods.

39. Refer to the October 14, 2025 Motion for Deviation. Provide a parcel map of the neighborhood SR 218 and the homes along Liletown Road. For each parcel provide the total acreage and whether the parcel has a residential structure on the land. If there is a structure on the parcel, explain the structure's design, historical use, and current condition.

40. Provide the distance of the setback that Exie Solar is requesting if the October 14, 2025 Motion for Deviation is granted.

41. Provide the distance of the setback that Exie Solar would request if the Siting Board determined that the homes along Liletown Road are a residential neighborhood.

42. Refer to response to Staff's First Request, Item 100, a table was provided that detailed each parcel by landowner. Provide a detailed table for each of the parcels stating the distance measurement in feet (not in meters) from each structure to the items 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.
- e. The distance to the BESS.

43. For the closest residence along Liletown Road, provide a table with distance to the following:

- a. Fencing.
- b. Closest Solar Panel.

- c. Closest Inverter.
- d. Substation.
- e. Battery Storage System.

44. Provide a table with the distances from the nearest nonparticipating residence (dwelling not property line) to the following:

- a. Fencing.
- b. Closest Solar Panel.
- c. Closest Inverter.
- d. Substation.
- e. Battery Storage System.

45. Of the 101 residential homes that may have a view of the project, provide the number that are participating landowners.

46. Provide a parcel map of the proposed site. Include all residences within 500 feet of the proposed project site. Identify the residences as participating or nonparticipating homes.

47. Explain how the debris from vegetation clearing is going to be disposed.

48. Explain whether screening will be added along Liletown Rd where the substation and BESS facility will be located. If there will be additional screening, update the vegetative screening plan to reflect these changes.

49. Provide the service times for Liletown United Methodist Church.

50. Provide the subsequent notice mailed to the homeowners on Liletown Road regarding the classification change related to residential neighborhood.

51. Of the residential homes that may have a view of the project, provide the number that are participating landowners.

52. Refer to the October 14, 2025 Motion for Deviation. Provide a parcel map for the residential neighborhood designated as SR 218. For each parcel provide the total acreage and whether the parcel has a residential structure on the land. If there is a structure on the parcel explain the structure's design, historical use, and current condition.

53. Refer to the October 14, 2025 Motion for Deviation. Include on the map the neighborhood along Liletown Road discussed in Exie Solar's October 14, 2025 Motion for Deviation. For each parcel provide the total acreage and whether the parcel has a residential structure on the land. If there is a structure on the parcel explain the structure's design, historical use, and current condition.

54. Provide a detailed table for each of the parcels in the response to Item 24 of this request stating the distance measurement in feet (not meters) from each structure to the items 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.
- e. The distance to the BESS.

55. Provide the entities with a direct ownership interest in Exie Solar. Include in the response the corporate structure of those entities.



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 **OCT 22 2025**

cc: Parties of Record

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