

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

In the Matter of:

ELECTRONIC APPLICATION OF LOST CITY)	
RENEWABLES LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	CASE NO.
250 MEGAWATT MERCHANT ELECTRIC SOLAR)	2024-00406
GENERATING FACILITY IN MUHLENBERG)	
COUNTY, KENTUCKY PURSUANT TO)	
KRS 278.710 AND 807 KAR 5:110)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION
TO LOST CITY RENEWABLES LLC

Lost City Renewables LLC (Lost City Renewables), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 28, 2025. The Siting Board directs Lost City Renewables 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.

Lost City Renewables shall make timely amendment to any prior response if Lost City Renewables 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 Lost City Renewables fails or refuses to furnish all or part of the requested information, Lost City Renewables 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, Lost City Renewables 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 any updates in communication with the Muhlenberg County Road Department. Please identify whether the communication was written or verbal, the method of communication, the parties involved, the date the communication occurred, and a summary of the communication.

2. Refer to Lost City Renewables' responses to Siting Board Staff's First Request for Information (Staff's First Request), Item 38.

a. Provide a map(s) depicting the proposed transmission line route and the right-of way. On the map include satellite imagery and parcel boundaries.

b. Identify the parcel owners and whether or not an easement has been secured. If an easement has been secured, provide the lease or deed.

c. State the total number of residential structures that may have a view of one or more transmission line poles.

3. Explain whether Mason Poyner Road is a one-lane or a two-lane road.

4. Refer to Lost City Renewables' responses to Staff's First Request, Item 20. Describe how trees will be removed from the site.

5. Refer to the Archeological Review submitted as an attachment to the responses to Staff's First Request, Item 63. Explain if any changes are expected to be made to the site layout given the findings in the review.

6. Refer to Lost City Renewables' responses to Staff's First Request, Item 42. Provide a narrative description of construction activities that will occur across the site and in what order they will occur.

7. Refer to Lost City Renewables' responses to Staff's First Request, Item 28. The response states that "[s]ite grading generally smooths the project area terrain". Explain whether smoother terrain, combined with the removal of vegetation, will cause greater surface runoff.

8. Refer to Lost City Renewables' responses to Staff's First Request, Item 34. Provide any updates regarding agreements with Boardwalk Pipelines or Texas Gas.

9. Submit a copy of the lease or purchase agreements, including options, separate agreements, or deeds which Lost City Renewables has entered into in connection with the proposed solar facility, including the agreements for each of the parcels of the project.

10. Detail any contracts by which Lost City Renewables 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.

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

13. State the number of residential structures that may have a view of any portion of the Project, including fencing, solar arrays, substation or other infrastructure.

14. Provide a map of the residential structures that may have a view of any portion of the Project.

15. 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.

16. Explain whether Lost City Renewables will pursue an Industrial Revenue Bond and Payment In Lieu of Taxes agreement with Muhlenberg County. If so, explain how that might change the cumulative tax revenues of the Project.

17. State the expected operational life of the Project.

18. Explain any commitments regarding infrastructure removal or land restoration during decommissioning included in the landowner lease agreements.

19. Refer to the Application, proposed site layout, and the residences along Free Lane. Explain why the houses along that lane do not meet the definition of a neighborhood pursuant to KRS 278.706 using size of lots and distance from the project site in the explanation.

20. Explain how this project is compatible with scenic surroundings.



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 APR 10 2025

cc: Parties of Record

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

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

*Rebecca C. Price
Sturgill, Turner, Barker & Moloney
155 East Main Street
Lexington, KY 40507

*Sean Joshi
Developer
Lost City Renewables Solar LLC
412 W. 15th Street
Floor 15
New York, NY 10011

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507