

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

In the Matter of:)	
)	
In the Matter of the Application of Lost City Renewables LLC for a Certificate of Construction for an Approximately 250 Megawatt Merchant Electric Solar Generating Facility in Muhlenberg County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:10)	Case No. 2024-00406
)	
)	

RESPONSE TO CONSULTANT’S REPORT

Lost City Renewables LLC (“Lost City”), by counsel, provides the following response to Elliot Engineering’s (“Elliot”) report filed with the Siting Board on May 19, 2025.

Lost City appreciates the time and effort Elliot and its contractors—Cloverlake Consulting Services (“Cloverlake”), Watters Unclaimed Property Consulting LLC (“Watters”), and Clark Toleman (“Toleman”)—have spent reviewing information related to this project. Ultimately, Lost City is very pleased that these independent evaluators concur with the fact that the proposed site in Muhlenberg County is suitable for a solar generating facility and should be approved for a construction certificate. Notably, the consultants confirmed the following:

- Cloverlake concluded that “Lost City Solar LLC is fully in compliance with the intent of the Kentucky Revised Statutes.”¹
- Watters explained that the economic analysis prepared by Dr. Paul Coomes supporting the positive economic impact of the project “is an effective advocacy supporting the

¹ Cloverlake Report at 3.

economic benefits arising from the Project. The report is thorough, organized, and complete, and its narrative and findings supported.”²

- Toleman noted that the study submitted by Kirkland Appraisals concluding that the facility “will have no impact on the value of adjoining or abutting properties and that the proposed use is in harmony with the area in which it is located”³ “is credible and representative of the market conditions that would exist should the Lost City Solar Project be constructed.”⁴
- Elliot ultimately recommends approval of the project with a few mitigation measures.⁵

With respect to the mitigation measures proposed by Elliot,⁶ Lost City generally agrees with the proposed measures and believes them to be reasonable. For example, Elliot agreed that there should be “limits on working hours during the construction period, as described in the Application,”⁷ which were 7 am to 7 pm Monday through Saturday generally, and limiting activities that create a higher level of noise, such as pile driving, to 8 am to 5 pm, Monday through Friday.⁸

As mentioned above, Lost City appreciates review and analysis by Elliot and its contractors. These reports clearly demonstrate support for the Siting Board’s approval of a certificate of construction for the Lost City project.

² Watters Report at 2.

³ Kirkland Report, Site Assessment Report at Appendix A, at 2

⁴ Toleman Report at 2.

⁵ See Elliot Report at 50.


⁶ To the extent that the Siting Board seeks to implement mitigation measures that were not identified by Elliot in its report or otherwise included in Lost City’s Site Assessment Report, Lost City respectfully requests “the opportunity to present evidence to the board regarding any mitigation measures” as required by KRS 278.708(6).

⁷ Elliot Report at 50.

⁸ Site Assessment Report at 7.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC

A handwritten signature in black ink, appearing to read "M. Todd Osterloh", is positioned above a horizontal line.

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