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

In the Matter of:)
Electronic Application on helplif of Loca City)
Electronic Application on behalf of Lost City)
Renewables LLC for a Certificate of Construction for a) Case No. 2025-00030
161kV Nonregulated Electric Transmission Line up to)
approximately 10.5 miles in Length in Muhlenberg and)
Logan Counties, Kentucky Pursuant to KRS 278.700, et)
seq. and 807 KAR 5:110)

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 September 12, 2025.

Lost City appreciates the time and effort Elliot has spent reviewing information related to this transmission line application. Elliot's evaluation supports the Siting Board granting approval for Lost City's application. Elliot's report noted:

- The Lost City transmission line will not be located in any areas containing "wild, scenic, or recreational rivers;" "scenic districts or roads, including areas that may be under a scenic easement or locally designated historic or scenic districts or overlooks;" or "parks (federal, state, or local), Recreation Areas, or Wildlife Management Areas."
- Lost City met "all the legal requirements like Easements, Agreements, Right of Way, and compliance with NESC, IEE, etc."²

-

¹ Elliot Report at 19.

 $^{^{2}}$ Id.

Elliot reviewed the statutory criteria in KRS 278.714 the Siting Board should consider when approving Lost City's application: "significant adverse impact of the transmission line on scenic assets" and "construction and maintenance of the transmission line according to all applicable legal requirements." Elliot determined that the project will not have any significant adverse impact on scenic assets and the project complies with all legal requirements. Elliot noted that Lost City should notify the Siting Board and rectify any adverse impacts to scenic assets or noncompliance with any legal requirement. Lost City is in complete agreement with Elliot's conclusion that the transmission application satisfies the statutory criteria for approval.

Elliot proposed five mitigation measures for the project, ⁶ and Lost City believes the proposed measures are reasonable. In fact, Lost City's project design and construction plan already incorporated most of Elliot's proposed mitigation measures. Lost City will create a detailed plan of the natural and manmade structures surrounding the transmission line to avoid any negative impact to the area during construction. This plan will be prepared prior to construction and, if requested, provided to the Siting Board. The engineering, procurement, and construction contractor ("EPC") Lost City will hire to construct the transmission line will coordinate appropriately with non-participating landowners regarding construction and deliveries to avoid any adverse impact during construction. Lost City and the EPC will provide notice to neighbors concerning construction. Additionally, Lost City has designed the transmission line to comply with all federal, state, and local codes. Specifically, Lost City's project will comply with all codes related to distances between the transmission line and any existing power line. Lost City also

_

 $^{^3}$ Id.

⁴ *Id.* at 19-20.

⁵ *Id*.

⁶ *Id*. at 21.

commits to minimizing any negative environmental impact from the construction and operation of the transmission line.

Lost City concurs with Elliot's consultant's report and appreciates the thoughtful review Elliot has provided in this application. Elliot's report clearly demonstrates that Lost City's application to construct a transmission line satisfies the criteria for approval by the Siting Board.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC

James W. Gardner

M. Todd Osterloh

Rebecca C. Price

333 West Vine Street, Suite 1500

Lexington, KY 40507

Phone: (859) 255-8581

E-mail: jgardner@sturgillturner.com E-mail: tosterloh@sturgillturner.com

E-mail: rprice@sturgillturner.com

Counsel for Lost City Renewables LLC