

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

**In the Matter of:** )  
 )  
**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** )

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**POST-HEARING FILING**

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Lost City Renewables LLC (“Lost City”), by counsel, provides the following post-hearing filing in support of its application for a certificate of construction for a 161kV transmission line in Muhlenberg and Logan Counties, Kentucky (the “Application”). Lost City acknowledges and appreciates the attention and review the Siting Board has given the Application. The Application satisfies all statutory requirements for approval of a construction certificate and should be approved.

Lost City filed the Application on June 10, 2025. After issuing two sets of Requests for Information, conducting a site visit, and tasking Elliot Engineering (“Elliot”) with the preparation of a consultant’s report evaluating the Application, the Siting Board conducted an evidentiary hearing on September 22, 2025. Witnesses Marty Marchaterre, Senior Environmental Planner and Project Manager at Copperhead Environmental Consulting; Shane Kelley, Team Lead of the Kentucky Natural Resources Team at Stantec; and David Crouse, Vice President of Engineering at Sunrise Renewables LLC appeared as witnesses for Lost City and provided testimony regarding various components of the Application.

The proposed 161 kV transmission line will connect Lost City’s solar generation substation to the TVA existing 161 kV transmission line at the Tennessee Valley Authority (TVA)-owned Lost City Substation.<sup>1</sup> The line will span approximately 10.5 miles in Muhlenberg and Logan Counties. Lost City selected this route because it is the shortest, most feasible route that affects the least number of property owners and avoids all residences and cemeteries.<sup>2</sup> The planned route will impact 28 unique landowners (36 parcels) and will generally cross large parcels of land to allow flexibility in the placement of poles on the leased properties.<sup>3</sup> The alternative routes Lost City considered would have had greater impact to both parcel owners and the TVA. One such route would have required extensive upgrades to the existing TVA transmission system that would take considerable amounts of time and resources. Another route considered would span approximately 13.7 miles in length and impact 55 unique landowners (79 parcels), residences, and cemeteries. The third route Lost City considered would have measured approximately 13.8 miles in length and would have affected over 100 unique landowners (257 parcels) and various structures and residences along the route.<sup>4</sup>

Lost City expects several poles along the transmission line route will be located in a 100-year flood plain.<sup>5</sup> Those poles have a different design and anchoring system than the poles Lost City will place in non-flood plains. The poles located in a flood plain will be deeper in the ground, will use additional fill to protect the poles from water, and will be made of steel.<sup>6</sup> Lost City will also obtain all necessary permitting for construction in a flood plain.<sup>7</sup> Prior to construction, Lost

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<sup>1</sup> Application at 2.

<sup>2</sup> *Id.* at 3.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> 9/22/25 VR at 33:50-34:28, 42:45.

<sup>6</sup> 9/22/25 VR 42:45-43:56; Response to RFI 1-24.

<sup>7</sup> *Id.*

City will clear all vegetation for the construction of the line,<sup>8</sup> and construction is expected to take 5 to 6 months.<sup>9</sup>

As noted by Elliot in its consultant's report, the transmission line will not have any significant adverse impact on scenic assets<sup>10</sup> because it will not be located in 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."<sup>11</sup> Lost City designed the transmission route to be the shortest, feasible route that will impact the least number of parcel owners and limit impact to scenic assets in Muhlenberg and Logan Counties.

Additionally, the Application complies with all legal requirements "like Easements, Agreements, Right of Way, and compliance with NESC, IEE, etc.," as Elliot found in its report.<sup>12</sup> Lost City designed the transmission line with 100 or 150 foot right-of-way limits ("ROW"), 50 or 75 feet from each centerline, with certain agreed variances.<sup>13</sup> All agreed variances to the ROW have been negotiated in easements with participating landowners based on landowner requests to have a smaller ROW on their property.<sup>14</sup>

Upon approval of the Application, Lost City will perform site studies as part of the TVA National Environmental Policy Act review process consistent with TVA requirements. In addition to the pending TVA studies and permitting, Lost City performed extensive studies for its solar generation application, which have been previously submitted to the Siting Board for review. In this Application, Lost City completed a Critical Issues Analysis and an eagle-raptor study for the

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<sup>8</sup> Response to RFI 1-3, and Response to RFI 2-4.

<sup>9</sup> Response to RFI 2-4.

<sup>10</sup> Elliot Report at 19-20.

<sup>11</sup> *Id.* at 19.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> 9/22/25 VR 25:30-27:26.

Siting Board's review and has already completed a Federal Aviation Administration Notice criteria review.<sup>15</sup> Lost City commits to continued compliance with all applicable legal requirements.

Lost City's Application to construct a transmission line satisfies all statutory criteria in KRS 278.714. The transmission line will have minimal adverse impact on local scenic assets and will be constructed in accordance with all applicable legal requirements. The Siting Board's consultant, Elliot, reviewed Lost City's Application and reached the same conclusion. The Siting Board should approve Lost City's Application for the reasons stated herein.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC



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<sup>15</sup> Response to RFI 1-26.