# Unbridled Solar, LLC Decommissioning Plan Henderson County, Kentucky



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#### 1. Introduction

Unbridled Solar, LLC (Unbridled Solar) is constructing an up to 160 MWac solar photovoltaic electric generating facility in Henderson and Webster Counties, Kentucky (the Facility). The Facility will span approximately 1,520 acres and will connect to the electrical grid at the Reid Substation. The operational life of the Facility is anticipated to be approximately 30 years. This Decommissioning Plan (Plan) describes the procedures, estimated costs, and financial assurances associated with decommissioning the Facility.

The goals for the Plan are to provide procedures for restoring the site to it's original use, based on the recent historical land use of the property, or other economical land uses as desired by the relevant landowner, at the end of the Facility's operational life. The Plan describes procedures and estimated costs for the removal of Facility components.

# 2. Project Components

The Facility generally consists of the equipment and infrastructure outlined below:

- Steel Piers and Racking
- PV Panels
- Inverters
- Electrical Collection Lines
- Access Roads
- Fencing, Gating, and Safety Features
- Operations and Maintenance Building
- Weather Stations
- Project Substation

# 3. Regulatory Compliance

Prior to the commencement of decommissioning, Unbridled Solar will perform the appropriate due diligence requirements and obtain the necessary local, state, and federal approvals to complete decommissioning activities. Unbridled Solar will assess the necessary permits and approvals in the future regulatory environment to maintain regulatory compliance. However, anticipated types of evaluations may include activities such as the following:

- Review of on-site jurisdictional status and potential impacts to wetlands and waterbodies to comply with the Clean Water Act.
- Review of compliance with the Endangered Species Act, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and any other relevant regulations at the time of decommissioning.
- Consultation with the Kentucky Energy and Environment Cabinet for compliance with any pertinent state regulatory requirements.

- Completion of a Phase I Environmental Site Assessment in support of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) protection
- Development and implementation of a Stormwater Pollution Prevention Plan (SWPPP).
- Henderson and Webster County building, road, discharge, or erosion control permits (as necessary).
- Special state or local hauling permits (as necessary).

### 4. Decommissioning

The Project will be decommissioned at the end of its useful life. The project is presumed to be at the end of its useful life if the facility generates no electricity for a continuous period of 12 months. At least 30 days prior to the commencement of decommissioning activities, Unbridled Solar will notify Henderson County staff. The following general decommissioning activities will occur:

- Removal of panels
- Removal of weather stations, inverters, electrical equipment, racking, and scrap
- Removal of piles
- Removal of access roads
- Removal of electrical collection lines
- Removal of fencing
- Removal of substation

Some components may be left in place under certain circumstances. Electrical lines that will not impact future use of the Project Area (at least 3 feet in depth) may be left in place per the County Solar Ordinance. Steel piles, where full removal is unattainable, may be cut and left in place at a depth of 3 feet or greater below the ground surface per the County Solar Ordinance. The Project substation could remain should another agreement necessitate its continued use. Utility owned infrastructure at the substation is not subject to decommissioning. Additionally, landowners may desire that private access roads or other Facility components remain in place for their personal use. Should a landowner request a road or structure (such as the O&M building) remain in place, Unbridled Solar will obtain a written request from the landowner.

# 5. Materials Salvage, Recycling, and Disposal

Many components of the Facility, such as racking, wiring, piles, and panels, retain value over time. Panels, while slightly less efficient, may be reused elsewhere, or components may be broken down and recycled. Recycling of solar panels and equipment is rapidly evolving and can be handled through a combination of sources such as certain manufacturers, PV Cycle (an international waste program founded by and for the PV industry), or waste management companies. More than 90 percent of the semiconductor material and glass can be reused in new modules and products. Other waste materials that hold no value will be recycled or disposed of via a licensed solid waste disposal facility.

#### 6. Site Restoration

Following the completion of decommissioning activities, the site will primarily be converted back to pre-construction land uses. The land will be graded as necessary, though minimal grading is expected to be required, and decompacted to allow for productive agricultural use. For areas not to be returned to agricultural use, soils will be decompacted and reseeded to establish adequate vegetative cover. Decommissioning of the Facility, including the removal of materials followed by site restoration, should be completed in approximately 12-18 months.

#### 7. Cost Estimate

Per the Henderson County Solar Ordinance, Article XXX, Section 30.021.G(1), a financial surety equal to 1% of the construction cost is required to cover the cost of decommissioning for Henderson County in the case of abandonment. As shown in Table 1, the estimated construction cost of the Facility is \$186,500,000 and 1% of that cost is \$1,865,000.

Table 1. Construction Costs

Item	Cost
Construction Contractor	\$111,000,000
Solar Modules	\$61,700,000
Inverters	\$8,300,000
Main Power Transformers	\$4,700,000
Supervisory Control and Data Acquisition (SCADA System)	\$800,000
Total	\$186,500,000
1% of Construction Cost	\$1,865,000

#### 8. Financial Assurance

Unbridled Solar will post a Letter of Credit, with Henderson County as the oblige, equal to \$1,865,000. Since the Project is located in both Henderson and Webster County, Unbridled Solar will post one Letter of Credit with Henderson County as the oblige to cover decommissioning costs for the Facility in both Henderson and Webster Counties. Unbridled Solar will reevaluate Facility cost with a qualified independent third party every five years thereafter during the life of the Project.