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

In the Matter of:

ELECTRONIC APPLICATION OF HENDERSON COUNTY SOLAR LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN APPROXIMATELY 50 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY IN HENDERSON COUNTY, KENTUCKY PURSUANT TO KRS 278.700 AND 807 KAR 5:110	)	Case No. 2020-00391

NOTICE OF FILING

Henderson County Solar LLC ("Applicant") hereby notifies the Kentucky State Board on Electric Generation and Transmission Siting ("Siting Board") of its transmittal of notices to required landowners on December 17, 2025, in compliance with Mitigation Measure Nos. 14 and 32; and submittal of the Applicant's final decommissioning plan attached hereto in compliance with Mitigation Measure No. 28 from the Order entered on December 22, 2021.

Respectfully submitted,

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Henderson County Solar Project Decommissioning Plan

PREPARED FOR

Stellar Renewable Power, LLC

DATE
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REFERENCE
0744519

DOCUMENT DETAILS

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1. INTRODUCTION

Stellar Renewable Power, LLC (Applicant) is proposing to construct the Henderson County Solar Project ("Project") in the northern portion of Henderson County, Kentucky, south of the Ohio River. The Project is situated on approximately 400 acres and will generate 50 megawatts (MW) alternating current (AC) of electricity with photovoltaic solar panels (Project Site). Arrays of photovoltaic modules will be mounted on single access trackers arranged in rows. Power conversion systems will be distributed throughout the Project area, comprised of 69 power inverters. The equipment will connect via underground electrical wiring to a Project substation. A 0.38-mile gen-tie line will connect the Project substation to an existing utility substation north of the Project Site.

This Decommissioning Plan (Plan) describes the decommissioning and restoration phase of the Project. The projected Commercial Operation Date (COD) is the fourth quarter of 2026; however, this is subject to change. The anticipated operating life of the Project is 35 years. Properly maintained utility-scale solar panels have an operating life of approximately 30 to 35 years with an opportunity for a project lifetime of more than 40 years with equipment replacement and repowering. Depending on market conditions and project viability, solar arrays may be retrofitted with updated components (e.g., modules, tracking system, etc.) to extend the life of a project.

This Plan includes an overview of the primary decommissioning Project activities, including the dismantling and removal of facilities and restoration of land. A summary of projected costs and revenues associated with decommissioning the Project are included in Section 3.

This Plan complies with Henderson County Zoning Ordinances outlined in Article XXX: Henderson County Solar Energy System Regulations (referred to heron as Henderson County Zoning) and qualifies as a Level 3 Solar Energy System (SES). Additional compliance with Kentucky Revised Statutes (KRS) 278.706(2)(m) (referred to as "2023 KRS HB4") is met.

To the extent applicable laws and regulations in the future conflict of this Decommissioning Plan, such laws and regulations may apply in lieu of the applicable portion of this Plan.

Project decommissioning may be triggered by events outlined in Henderson County Zoning Section 30.02(g)(1), such as abandonment, defined as a cessation of power of 12 months without continuous transfer of energy, the end of a power purchase agreement, the end of a land lease, or when the Project reaches the end of its operational life. 2023 KRS HB4 requires that decommissioning activities be completed within 18 months of the Project ceasing to produce electricity for sale unless the deadline has been extended by the Secretary of the Kentucky Energy and Environment Cabinet ("EEC"). Monitoring and site restoration may extend beyond this period to ensure successful revegetation and rehabilitation.

During the Project's useful life, solar panels that are replaced or discarded will be removed from the site within 90 days unless an extension has been granted by the EEC.

2. PROJECT COMPONENTS AND DECOMMISSIONING ACTIVITIES

Approximate quantities of solar project components are based on data provided by Stellar Renewable Power in the form of KMZ and ArcGIS shapefiles (SHP). Pursuant to Henderson County

Zoning, Section 30.02(g)(2), all non-utility owned Project components will be removed to a depth of 36 inches.

2.1 SOLAR PROJECT COMPONENTS

The main components of the Project Site include:

- solar modules and associated above ground cabling
- tracking system and steel piles
- inverters
- medium voltage (MV) cable system (below ground electrical cabling and conduits)
- Direct current (DC) collection system (below ground electrical cabling and conduits)
- perimeter fencing
- retention basins
- primary and secondary site access roads
- project substation
- associated overhead transmission line
- Estimated quantities of materials to be removed and salvaged or disposed of are included in this section. Table 1 presents a summary of the primary components of the Project included in this Plan.

TABLE 1 PRIMARY PROJECT COMPONENTS TO BE DECOMMISSIONED

Component	Unit	Approximate Quantity
Solar Modules	Each	120,900
Steel Piles	Each	19,952
Inverters	Each	69
MV (medium voltage) cabling	Linear Foot	32,225
DC (direct current) cabling	Miles	275
Perimeter Fencing	Linear Foot	41,381
Sediment Basins	Each	18
Access Roads	Linear Foot	19,914
Substation	Each	1
Overhead Transmission Line	Linear Foot	2,006

2.2 DECOMMISSIONING SEQUENCE

The anticipated sequence of decommissioning and removal is described below; however, overlap of activities is expected.

- De-energize solar arrays.
- Install temporary erosion perimeter controls and best management practices (BMPs) to protect sensitive resources.
- Reinforce access roads, if needed, and prepare Site for component removal.
- Dismantle panels and above ground wiring.
- Remove trackers and piles.
- Remove inverter stations with associated foundation components,
- Remove above and below-ground electrical cables and conduits to a depth of 36 inches or deeper as agreed with the landowner.
- Remove perimeter fencing.
- Remove sediment basins.
- Remove access and internal roads not required by the landowner and grade site to restore original contours, as necessary.
- Remove Project substation and above ground transmission line.
- De-compact subsoils (if required), restore and revegetate disturbed land to a similar state as before Project construction, and remove temporary erosion control measures.

2.3 DECOMMISSIONING EQUIPMENT

Equipment required for the decommissioning activities will be similar to construction of the solar facility and may include small cranes, low ground pressure (LGP) track mounted excavators, backhoes, LGP track bulldozers and dump trucks, front-end loaders, deep rippers, water trucks, disc plows and tractors to restore subgrade conditions, and ancillary equipment. Standard dump trucks may be used to transport material removed from the Site to disposal or recycling facilities.

2.4 SOLAR MODULES

The Applicant is considering bifacial modules for the Project. The preliminary module selection is BiN-08-580 M10, manufactured by Waaree. A specific panel selection is not anticipated to materially alter the conclusions of this plan. A typical module is mainly comprised of non-metallic materials such as silicon, tempered glass, plastic, and epoxies, with an anodized aluminum alloy frame.

At the time of decommissioning, module components in working condition may be refurbished and sold on a secondary market yielding greater revenue than selling as salvage material. If the sale and reuse of solar modules is not an option at the time of decommissioning, the solar modules may be transported to a material recycling facility for processing and salvage.

2.5 TRACKING SYSTEM AND SUPPORT

The solar modules will be mounted on a single axis, one-in-portrait tracking system, supported by structural poses (piles). The tracking systems are typically comprised of galvanized steel with some aluminum structural members.

The solar arrays will be deactivated from the surrounding electrical system and made safe for disassembly. Tracker lubricants will be removed and properly disposed of or recycled according to regulations current at the time of decommissioning. Electronic components, and internal electrical wiring will be removed and salvaged. The piles will be completely removed.

The supports, tracking system, and piles contain salvageable materials which will be sold to provide revenue to offset decommissioning costs.

2.6 INVERTERS

The preliminary selection for inverters is PVU-L840GR, manufactured by TMEIC. Inverters located within the array will be deactivated, disassembled, and removed. Depending on its condition, the equipment may be sold for refurbishment and re-use. If not re-used, they will be salvaged or disposed of at an approved solid waste management facility. Oils and lubricants will be collected and disposed of at a licensed facility.

2.7 ELECTRICAL CABLING AND CONDUITS

The Project's underground electrical collection system will be installed at a depth of approximately 30 inches for direct current cables and approximately 48 inches for MV cables and conduits. Approximately 32,225 feet of MV cabling and 275 miles of DC cabling will be used in the construction of the Project. Underground cabling that is located three feet or less will be removed and salvaged in compliance with Henderson County Zoning, while cable located greater than three feet in depth may be abandoned in place. For the purpose of this Plan, the removal of the MV collection system cables and conduits is assumed. Removed cabling will be collected and sold for salvage or brought to a recycling facility.

2.8 PERIMETER FENCING AND ACCESS ROADS

The Project Site will include a fence surrounding the perimeter of each array section. The fencing will be removed and sold for salvage or recycled at the end of the decommissioning phase.

A network of access roads will allow access to solar facility equipment. The access roads will be composed of an aggregate layer and will be approximately 19,914 feet (3.8 miles) in length with turnaround areas as needed for access. The access road lengths may change with the final Project Site design. Access roads will be removed during decommissioning.

Decommissioning activities include the removal and stockpiling of aggregate Project materials for salvage preparation. It is conservatively assumed that all aggregate materials will be removed from the Project and hauled from the Project area. Following removal of aggregate, the access road areas will be graded, de-compacted with deep ripper or chisel plow (ripped to 18 inches), backfilled with native subsoil and topsoil, as needed, and land contours restored to a substantially similar state as it was prior to the commencement of construction of the Project.

2.9 PROJECT SUBSTATION AND ABOVE GROUND TRANSMISSION TIE-IN LINE

The Project will include a Project substation. The substation footprint will contain within its perimeter a gravel pad, power transformer and footings, electrical control house and concrete foundations. An approximately 0.38-mile-long dedicated overhead transmission tie-in line will be constructed for the Project. The Project substation and transmission line are considered "interconnection and other facilities" as described in 2023 KRS HB4, and be removed in accordance with Henderson County Zoning, with land restored to a substantially similar state as it was prior to commencement of construction of the Project.

When decommissioned, the substation transformer may be sold for re-use or salvage. Components of the substation that cannot be salvaged will be transported off-site for disposal at an approved waste management facility. Foundations and footings will be demolished and removed.

2.10 RESTORATION AND REVEGETATION

Final decommissioning tasks will include back-filling of pile and foundation sites; de-compaction of subsoils; grading of surfaces to pre-construction land contours; and revegetation of the disturbed areas. For purposes of developing the opinion of probable decommissioning cost, it is assumed that limited site grading will occur as part of Project decommissioning.

2.11 SEDIMENT BASINS AND WATER PROTECTION

The Project will include eighteen sediment basins located adjacent to the solar arrays. Associated foundations, piers, pipes, and additional features will be excavated and hauled off-site to be recycled. The excavated area with then be backfilled with native soil and land contours restored to a substantially similar state prior to construction of the Project.

Surface water conditions at the Project Site will be reassessed prior to the decommissioning phase. The Applicant will obtain the required water quality permits from the EEC and the U.S. Army Corps of Engineers (USACE), as needed, prior to decommissioning the Project. Required construction stormwater permits will also be obtained, and a Stormwater Pollution Prevention Plan (SWPPP) prepared describing the protection needed to reflect conditions present at the time of decommissioning. BMPs may include enhancement of construction entrances, temporary seeding, permanent seeding, mulching (in non-agricultural areas), erosion control matting, silt fence, filter berms, and filter socks.

3. OPINION OF PROBABLE DECOMMISSIONING COST

Expenses associated with decommissioning the Project will be dependent on labor costs at the time of decommissioning. For the purposes of this report, 2025 average market values and similar project experience were used to project labor expenses. Fluctuation and inflation of the labor costs were not factored into the projections.

3.1 DECOMMISSIONING EXPENSES

Decommissioning costs include costs associated with disposal of components not sold for salvage, including materials which will be disposed of at a licensed facility, as required. Decommissioning costs also include backfilling, grading, and restoration of the proposed Project site as described in Section 2. Table 2 summarizes the projections for decommissioning activities associated with the major components of the Project.

TABLE 2 PROJECTED DECOMMISSIONING EXPENSES

Activity	Unit	Number	Cost per Unit	Total
Solar Removal				
Reinforce Access Roads	Linear Foot	19,914	$15.00	$298,700
Erosion Control	Acre	327	$250.00	$81,600
Module Disassembly and Removal	Each	120,900	$7.75	$937,000
Pile Removal	Each	19,952	$37.60	$750,200
Inverter Removal	Each	69	$4,750.00	$327,800
Below Grade Cable Removal, MV Cabling	Linear Foot	32,225	$3.20	$103,100
Fencing Removal	Linear Foot	41,381	$8.35	$345,500
Retention Basin Removal	Cubic Yard	51,414	$20.00	$1,028,300
Access Road Removal	Linear Foot	19,914	$28.50	$567,500
Site Leveling and Seeding	Acre	327	$4,000.00	$1,306,200
Substation and Transmission Line Removal				
Electrical Equipment Removal	LS	1	$150,000.00	$150,000
Fencing and Foundations Removal	LS	1	$46,500.00	$46,500
Aggregate Removal and Spread Topsoil	Square Yard	29,970	$10.50	$314,700
Transmission Line Removal	Linear Foot	2,006	$25.50	$51,200

Activity	Unit	Number	Cost per Unit	Total
Subtotal				***$6,308,300***
Indirect Costs				$1,261,700
Owner's Costs				$120,000
Total Estimated Decommissioning Costs				**$7,690,000**

3.2 OPINION OF PROBABLE SALVAGE VALUE COST

An opportunity will be present to reclaim material scrap value from electrical equipment and other decommissioned components, such as piles, racking and fencing. The salvage values were projected by a consultant with extensive knowledge in the removal of industrial facilities. Projections are based on current 2025 costs. The projected salvage value of the project array is presented in Table 3.

TABLE 3 PROJECTED DECOMMISSIONING REVENUES

Item	Unit	Quantity per Unit	Salvage Price per Unit	Total Salvage Value
Aluminum	Tons	388	$800.00	$310,100
Copper	Tons	13	$5,200.00	$66,200
Steel	Tons	3,452	$190.00	$655,900
Silicon	Tons	176	$800.00	$140,600
Glass	Tons	2,489	$100.00	$249,000
Total Potential Revenue				**$1,421,700**

3.3 DECOMMISSIONING COST SUMMARY AND FINANCIAL ASSURANCE

The following is a summary of the projected net cost to decommission the Project, using the information detailed in Sections 3.1 and 3.2. Projections are based on 2025 prices, with no market fluctuations or inflation considered. Table 4 represents the total projected net decommissioning cost.

TABLE 4 NET DECOMMISSIONING COST SUMMARY

Projected Totals	Cost/Revenue
Decommissioning Expenses	$7,690,000
Potential Revenue (salvage value)	$1,421,700
Net Decommissioning Cost	$6,268,300

The Applicant will be responsible for providing a surety bond, or similar security acceptable to Henderson County, to ensure financial performance of decommissioning in accordance with this plan. The bond or similar security will comply with Henderson County and 2023 KRS HB4 requirements, including the following:

- The bond shall be one percent of the total project cost (Table 5) re-calculated on a period of every five years during the project life. The bond or other similar security will be provided by an insurance company or surety that shall at all times maintain at least an "Excellent" rating as measured by the AM Best rating agency or an investment grade credit rating by any national credit rating agency and, if available, shall be noncancelable by the provider or the customer until completion of the decommissioning plan or until a replacement bond is secured.
- The bond or similar security will name each landowner from whom the Applicant leases land and the Energy and Environment Cabinet as the primary co-beneficiaries and will name Henderson County as secondary beneficiary once consent is secured.
- The bond or other similar security will provide that at least thirty (30) days prior to its cancellation or lapse, the surety shall notify the Applicant, its successor or assign, each landowner, the Energy and Environment Cabinet, and the county or city in which the facility is located of the impending cancellation or lapse. The notice shall specify the reason for the cancellation or lapse and provide any of the parties, either jointly or separately, the opportunity to cure the cancellation or lapse prior to it becoming effective. The Applicant, its successor, or its assign shall be responsible for all costs incurred by all parties to cure the cancellation or lapse of the bond. Each landowner, or the Energy and Environment Cabinet with the prior approval of each landowner, may make a demand on the bond and initiate and complete the decommissioning plan.

TABLE 5 TOTAL CAPITAL EXPENDITURE COSTS AND BOND AMOUNT AS CALCULATED IN 2025

Component	Cost
Modules	$20,753,500
Racking	$8,618,300
Balance of Plant	$24,082,000
Contingency	$2,898,700
Inverters	$5,142,400
Project Site Substation (including OH T-Line)	$4,900,100
HV Transformer	$2,300,000
Additional Utilities	$521,700
Total PV Plant	$69,216,800
Bond Amount (1% of Total CapEx Cost)	**$692,200**