

> **Decommissioning Plan**
Martin County Solar Project
Martin County, Kentucky

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Prepared for:
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Table of Contents

1.0 Introduction	1-1
1.1 Solar Facility Components	1-2
1.2 Anticipated Project Life	1-2
2.0 Decommissioning Tasks and Sequences	2-1
3.0 Site Restoration and Revegetation	3-1
4.0 Decommissioning Cost Estimate Summary	4-1
5.0 Financial Assurance	5-1

Appendices

List of Tables

Table 4-1.	Estimated Decommissioning Costs	4-1
Table 4-2.	Estimated Salvage Value	4-2
Table 4-3.	Estimated Net Decommissioning Cost.....	4-2

1.0 Introduction

Martin County Solar Project, LLC (“Martin County Solar”) contracted Environmental Consulting & Technology, Inc. (“ECT”) to prepare a Decommissioning Plan (“Plan”) for the 646-acre Martin County Solar Project (“Project”) near Pilgrim, Martin County, Kentucky. This Plan was prepared to ensure proper decommissioning of the Project. This Plan provides a description of decommissioning and restoration of the Project and meets the requirements of the order from the Kentucky State Board on Electric Generation and Transmission Siting (“Siting Board”).

The Project is a 111-megawatt alternating current (“MW AC”) solar facility capable of providing clean, renewable electricity to approximately 18,000 Kentucky homes. The Project components will include photovoltaic (“PV”) solar panels (approximately 214,132 modules) that will be mounted on single-axis tracking systems, along with the associated infrastructure of approximately 36 inverters with one transformer each, underground electrical collection systems, electrical collector substation with one main power transformer, point of interconnection switchyard, a short overhead transmission line, operations and maintenance (“O&M”) and battery energy storage system (“BESS”) structures, SCADA system, control building, internal gravel access roads with gated ingress/egress points and security fencing. Temporary facilities associated with construction will include a construction laydown yard. Collectively, the facilities listed in this paragraph comprise the “Project Facilities”.

The Project proposes a 111 MW AC solar facility that will connect to an existing Kentucky Power substation on site. The substation will be expanded to include the addition of two (2) 138 kilovolt (“kV”) circuit breakers for Project interconnection. The anticipated start of construction is planned for October 2023, with a commercial operation date (“COD”) of the end of October 2024.

The purpose of this Plan is to ensure that, upon a decommissioning event: expiration of the operational life of the Project, or abandonment of the Project, all Project Facilities will be removed, and the Project property will be restored pursuant to the agreement. As required by the Siting Board a surety bond will be issued prior to commencement of operation in the amount equal to the net cost to decommission the Project and reconstitute the land, as agreed upon by the Siting Board. The decommissioning plan, the cost estimate, and the bond will be reviewed every five years and will

remain in place for the length of the land rights agreements or completion of decommissioning and restoration.

This Plan provides a description of the decommissioning activities for all facilities, including removal procedures, schedules, and planned restoration of the land. Estimated costs are provided based on the proposed 111-MW AC array design.

1.1 Solar Facility Components

The primary components of the Project include the following solar components and associated infrastructure:

- Solar panels and racking
- Operation and maintenance building
- Battery energy storage system building
- Project substation
- Overhead transmission line
- Tracking system
- Electrical cabling and conduits
- Foundations and steel piles
- Transformers and inverters
- SCADA hardware system
- Control house for protective relay panels and site controllers
- Security fencing

1.2 Anticipated Project Life

Martin County Solar Project, LLC, the owner of the Project, or its successors and assigns, is responsible for the decommissioning of the Project. Utility-scale solar facilities are designed to operate for a minimum of twenty to thirty years; however, the possibility exists for the Facility to operate past that given future repairs and upgrades to the technology and renewal in the energy contract. The surety bond or financial equivalent will be in place for the length of the land rights agreements with participating property owners or completion of decommissioning and restoration.

2.0 Decommissioning Tasks and Sequences

Martin County Solar acknowledges that all solar components including Project Facilities as defined, constructed above ground, and any structures below grade will be removed offsite for disposal, except for (i) access roads or driveways on private property if the property owner requests in writing to Martin County Solar for such to remain and (ii) pre-existing substation, transmission line, switchyard, interconnection facilities and other similar utility facilities not owned by Martin County Solar at the time of decommissioning.

Martin County Solar anticipates decommissioning and restoration activities will occur over a twelve (12) month period and will coordinate with staff prior to the start of any decommissioning activities.

All required approvals will be obtained prior to the start of decommissioning, and may include, but are not limited to the following:

- United States Army Corps of Engineers (“USACE”) maintains jurisdiction over Waters of the U.S. (“WOTUS”) maintained under Section 10 of the federal Rivers and Harbors Act of 1899 and their adjacent wetlands. A permit is required from USACE for activities, such as but not limited to, the placement of fill, dredging of material, draining surface water, or removing a structure within these regulated areas.
- Martin County for any road permits, soil erosion, water quality, construction stormwater, septic and well, and building permits, as required.
- A Stormwater Pollution Prevention Plan (SWPPP) will be prepared to include best management practices for construction and decommissioning that might include construction entrances, silt fencing, temporary seeding, permanent seeding, mulching (in non-agricultural areas), erosion control matting, filter berms, and filter socks.

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

- De-energize solar arrays, if not already de-energized
- Dismantle panels, racking, and frame
- Remove inverters, transformers, and electrical cables and conduits below the surface
- Remove fencing and miscellaneous equipment
- Remove structural foundations and optional – access and internal roads (if not retained by owner)
- De-compact subsoils (if required), restore, and revegetate disturbed land to pre-construction conditions to the extent practicable (if desired by the landowner at the time of decommissioning)

3.0 Site Restoration and Revegetation

Restoration efforts by Martin County Solar, its successors, or assigns, will abide by the specific land restoration commitments agreed to by the individual property owners, as described in each landowner agreement, and/or return the land to substantially its pre-construction condition to the extent practicable, leaving any desirable infrastructure as requested by the subsequent landowner.

Restoration activities may include regrading to restore land contours, seeding to revegetate disturbed areas, de-compacting of soils determined to be compacted, and back-filling with native subsoil or topsoil (as needed).

Martin County Solar will comply with the conditions agreed upon by Martin County Solar Project, LLC, and the Siting Board or as directed by other federal and state regulations applicable to the Project at the time of decommissioning.

4.0 Decommissioning Cost Estimate Summary

Decommissioning costs detailed in Table 4-1 include labor and material expenses for the dismantling and removal of solar modules, tracking system, steel posts, transformers and inverters, perimeter fencing, and electrical cables and conduit (as recoverable). Labor effort is calculated based on approximately 100 full-time equivalent staff employed over a one-year period. Restoration activities may include subsoil de-compaction, grading, and seeding of the disturbed land.

Table 4-1. Estimated Decommissioning Costs

Decommissioning Task Description	Cost
De-energize electrical components.	\$ 29,040
Dismantle and disposal panels, racking, and frames (275,600 PV panels and associated infrastructure).	\$ 4,003,456
Remove inverters, substation equipment, and electrical cables and conduits (as recoverable).	\$ 48,851
Remove fencing and miscellaneous equipment.	\$ 839,552
Remove structural foundations and access and internal roads (approximately 1,778,961 sq ft of gravel improvements) if not retained by the property owner.	\$ 0
De-compact soils (if needed), restore and restore disturbed land to pre-construction conditions to the extent practicable, and revegetate any exposed soil that was disturbed during decommissioning.	\$ 0
Total Estimated Decommissioning Costs	\$ 4,920,899

All solar components will be salvaged, recycled, or hauled offsite to a licensed solid waste disposal facility. Solar components that are anticipated to have a resale or salvage value that may be used to offset the cost of decommissioning include solar modules, tracking systems, steel piles, inverters, and transformers. See Table 4-2 for estimated salvage revenue. Materials that have no value at the time of decommissioning will be recycled when possible or hauled offsite to a licensed solid waste disposal facility.

Table 4-2. Estimated Salvage Value

Salvage Component	Estimated Salvage Value
De-energize electrical components	\$ 0
Dismantle and disposal of panels, racking, and frames.	\$ 2,429,775
Remove inverters, substation equipment, and electrical cables and conduits (as recoverable).	\$ 104,625
Remove fencing and miscellaneous equipment.	\$ 12,312
Remove structural foundations, and remove access and internal roads (optional, if not retained by the property owner).	\$ 0
De-compact soils (if needed), restore and restore disturbed land to pre-construction conditions to the extent practicable, and revegetate any exposed soil that was disturbed during decommissioning.	\$ 0
Total Estimated Salvage Value	\$ 2,546,712

The net estimated cost to decommission the Project (Table 4-3), is based on the estimated labor and material expenses to remove the solar components and Project Facilities and restore the land to its pre-development state, less any salvage value received. All estimates are based on 2023 prices, with no market fluctuations or inflation considered. This estimated decommissioning cost will be revised and submitted at least 30 days prior to the commencement of operations. Martin County Solar will provide the required bond amount prior to operations.

Table 4-3. Estimated Net Decommissioning Cost

Activities	Estimated Cost/Revenue
Total Estimated Decommissioning Costs	\$ 4,920,899
Total Estimated Salvage Value	\$ 2,546,712
Total Estimated Decommissioning Costs minus Salvage Value	\$ 2,374,187

5.0 Financial Assurance

The decommissioning cost estimate will consider the salvage value of the components (“Net Decommissioning Cost”). If and when the Net Decommissioning Cost is a positive number, Martin County Solar will post decommissioning funds in the form of a surety bond, cash, letter of credit, guaranty, including affiliate guaranty or other financial assurance. An updated decommissioning plan and Net Decommissioning Cost estimate will be provided at least thirty (30) days prior to the commencement of operations, based on final construction plans and solar components. The decommissioning plan and financial assurance will be reviewed again every five (5) years of operations to assess the value of the financial assurance per the current Net Decommissioning Cost estimate.