

Mohawk Solar

Case No. 17-F-0182

1001.29 Exhibit 29

Site Restoration and Decommissioning

EXHIBIT 29 SITE RESTORATION AND DECOMMISSIONING

(a) Performance Criteria

The Applicant anticipates a Facility lifespan of approximately 30 years or more. In the event the Facility reaches its end of life and ceases operations without expectation of returning to operation, or if initial construction cannot be completed, the Facility will be decommissioned per the Decommissioning Plan, a draft of which is provided in this Application as Appendix 29-A.

Should decommissioning be required, it will be conducted in accordance with the following standards and criteria:

Table 29-1. Decommissioning Performance Criteria

Consideration	Performance Standard or Criteria
Site Safety and Removal of Hazardous Conditions	The Decommissioning of the solar plant shall be supervised and carried out by trained personnel familiar with the risks associated with decommissioning of electrical and/or potentially hazardous equipment. During the decommissioning process, all transformers will be drained of insulating oil and switchgears drained of insulating SF6 gas. These materials will be disposed of off site at appropriate facilities.
Environmental Impacts	The Applicant commits to obtaining proper permits and implementing plans to address spill prevention. The Applicant also commits to utilizing stormwater and erosion control measures similar to those used during the construction phase. These methods are included in the Facility's SWPPP (Appendix 21-B). Stormwater and erosion control measures will remain in place until the restored site is stabilized. Additional potential impacts from decommissioning efforts include elevated sound levels; however, such activities will occur during daylight hours and will conform to any local sound ordinances and applicable restrictions.
Aesthetics	All aboveground features will be removed with the exception of the POI switchyard, transmission line segment, and support structures. The Facility Site will be graded to reflect pre-construction conditions and may be planted with a temporary seed mix in agricultural areas. Additional plantings may occur in agricultural areas in accordance with individual lease agreements. If forested areas are removed due to Facility

Consideration	Performance Standard or Criteria
	construction, the area will be stabilized and planted with a native mix to promote a natural succession of the area.
Salvage and Recycling	Most of the materials used for the Facility are reusable or recyclable, including PV modules. Any materials remaining due to decommissioning will be removed and disposed of off-site at appropriate facilities. During the Facility's lifespan it is anticipated that technology will continue to advance and new recycling and reuse practices will be available. The Applicant will determine the best method of disposal for solar modules and additional components at the time of decommissioning and in accordance with manufacturer's guidelines and State, local, and federal regulations. See Decommissioning Plan for additional discussion of salvage details.
Future Uses for the Site	The Applicant will perform decommissioning in a manner consistent with allowable future intended use of parcels within the Facility Site. All components will be removed to a maximum depth of 48 inches. Restoration measures will be compliant with NYSDAM Guidelines for Agricultural Mitigation for Solar Energy Projects and will be carried out in accordance with landowner agreements.
Useful Life of the Facility	Life span is assumed to be 30 years or more.

(b) Decommissioning and Restoration Plan

The Decommissioning Plan, in Appendix 29-A of this Application, addresses the decommissioning process and funding methods, including a detailed cost estimate. Utility-scale solar facilities typically have a life expectancy of 20-40 years (NYSUN, 2016), with the Facility having an anticipated life expectancy of 30 years. Decommissioning will be triggered if the Facility is non-operational for not less than two years, unless longer period is otherwise agreed to by Towns or DPS. At the end of the Facility's life, decommissioning will commence, to the maximum extent practicable, to pre-construction conditions.

Decommissioning will consist of the following activities:

- All above-ground structures, including PV panels, racking structures, inverters, fencing, above-ground collection or transmission cables and poles, O&M Facility, and substation will be disassembled and transported offsite for reuse, recycling, reclamation, or sale. The POI switchyard will remain in place and will

be owned by National Grid following construction. As for the collection substation, it will be shut down, disconnected, and removed. The segment of transmission line, and associated support structures that connect the POI switchyard to the existing 115kV transmission line will remain onsite. The segment of transmission line and support structures connecting the collection substation to the POI switchyard will be removed. The removal and disposal of all components will comply with applicable federal, state, and local regulations.

- Access roads will be removed, unless otherwise specified by the landowner, de-compacted, and graded to reflect pre-construction conditions. Storm pipes and culverts associated with the access roads will also be removed and restored.
- Collection lines buried 48 inches or less below the ground surface (bgs) will be disconnected and removed from the site. Collection lines buried greater than 48 inches will be left in place. Removal methods will include the use of a tractor or back hoe to pull cables out of common trenches unless otherwise specified by a landowner.

In addition to providing detailed information concerning the site decommissioning process, the Decommissioning Plan includes:

- A detailed cost estimate to support the proposed decommissioning and site restoration funding upon the cessation of operation of the Facility based on the expected solar panel(s) to be used.
- Details of the methodology for removal of the equipment, salvage value, wage assumptions for future equipment removal, and periodic updates to the cost estimates and value of financial surety.
- A procedure and timeframe for notifying the Towns of Canajoharie and Minden and potentially impacted landowners about site decommissioning and restoration activities.

Financial assurance will be in the form of a letter of credit, a bond, escrow account, a parent guarantee or other form approved by the towns where the Facility is located in the amount of the net decommissioning costs as approved/agreed to by the towns. When the Applicant posts financial assurance, it will provide the towns with clear instructions on how to access the financial assurance should it become necessary.

Former agricultural lands may be returned to their former state where suitable conditions exist. Restoration of agricultural land will be performed in accordance with landowner agreements and NYSDAM's Guidelines for Agricultural Mitigation for Solar Energy Projects (NYSDAM, 2017). Some areas will be replanted with crops desired by the landowner, depending on the nature of agreements in place. More information on these guidelines is provided in the Decommissioning Plan (Appendix 29-A).

Disturbed areas not used for agricultural purposes will be reseeded with native grasses. Native seeds and weed-free mulch will be used to prevent the spread of nuisance and invasive species. In addition to seeding, these areas will be returned to pre-construction condition, to the maximum extent practicable, through grading, backfilling, and stabilizing.

Erosion and sedimentation controls for decommissioning efforts will be addressed in conformance with the NYS State Pollution Discharge Elimination System (SPDES) Stormwater General Permit for Construction Activity program regulations whereby a Notice of Intent and SWPPP will be prepared prior to start of decommissioning activities. These controls will be developed in accordance with the New York State Standards and Specifications for Erosion and Sediment Control. Common BMPs proposed for decommissioning activities include silt fencing to prevent sedimentation impacts on local waterways, temporary water management controls as well as berms and mulch to prevent soil erosion and promoting site stability.

(c) Description of Decommissioning/Restoration Agreements Between Applicant and Landowners

All Facility components will be located on private land under lease agreement with the landowners, and all leases with private land owners contain a provision on decommissioning. Although the specific terms of lease agreements are confidential, decommissioning will involve the removal of all above ground Facility components consistent with the discussion in Section (a) above and the Decommissioning Plan. The POI switchyard and transmission line with support structures near the POI switchyard will remain in place and will be owned by National Grid following construction. A description of site decommissioning and restoration activities, projected costs, and financial assurance commitments between the Applicant and the Towns of Minden and Canajoharie are contained in the Decommissioning Plan, included as Appendix 29-A.

(d) Nuclear Power Facilities

This section is not applicable and therefore will not be addressed in the Article 10 Application.

REFERENCES

New York State Department of Agricultural and Markets (NYSDAM). 2017. Guidelines for Agricultural Mitigation for Solar Energy Projects. https://www.agriculture.ny.gov/ap/agservices/Solar_Energy_Guidelines.pdf.

NYSUN, 2016. NY-Sun NYSERDA Decommissioning Solar Panel Systems Fact Sheet. Assessible: <https://www.nyseda.ny.gov/-/media/NYSun/.../Decommissioning-Solar-Systems.pdf>