

Clearview Solar I, LLC

Clearview Solar

Exhibit J

Preliminary Decommissioning Plan

Case No. 20-1362-EL-BGN

DECOMMISSIONING PLAN AND COST EVALUATION

**FOR THE:
CLEARVIEW SOLAR PROJECT
ADAMS TOWNSHIP
CHAMPAIGN COUNTY, OHIO**

OSPB CASE NUMBER 20-1362-EL-BGN

**PREPARED FOR:
CLEARVIEW SOLAR I LLC
1105 NAVASOTA STREET
AUSTIN, TX 78702**

SEPTEMBER 2020

TABLE OF CONTENTS

	PAGE
1.0 EXECUTIVE SUMMARY	1
<u>1.1 Introduction.....</u>	1
<u>1.2 Results.....</u>	1
2.0 PROJECT DESCRIPTION.....	3
<u>2.1 Project Introduction.....</u>	3
<u>2.2 Solar Module Units.....</u>	3
<u>2.3 Underground Electric Collection Cables, Inverters and Transformers.....</u>	3
<u>2.4 Substation and Interconnection Transmission Line.....</u>	3
<u>2.5 Access Roads</u>	4
<u>2.6 Solar Meteorological Stations and Supervisory Control and Data Acquisition (“SCADA”) System.....</u>	4
3.0 DECOMMISSIONING PLAN	5
<u>3.1 Solar Module Units.....</u>	5
<u>3.2 Underground Electric Collection Cables, Inverters and Transformers.....</u>	6
<u>3.3 Substation and Interconnection Transmission Line.....</u>	6
<u>3.4 Access Roads</u>	6
<u>3.5 Solar Meteorological Stations and Supervisory Control and Data Acquisition (“SCADA”) System.....</u>	7
4.0 SITE RECLAMATION	8
5.0 DECOMMISSIONING COSTS	9
6.0 DECOMMISSIONING SCHEDULE AND PERMITS.....	10
7.0 DECOMMISSIONING ASSUMPTIONS	11
8.0 STANDARD OF CARE AND LIMITATIONS	12

APPENDICES

Appendix A	Decommissioning Cost Evaluation
Appendix B	Project Schedule

1.0 EXECUTIVE SUMMARY

1.1 Introduction

Hull & Associates, LLC (Hull) was retained by Clearview Solar I LLC to conduct the Clearview Solar Project Decommissioning Study. The Clearview Solar Project is a solar-powered electric generation facility planned to consist of large arrays of ground mounted solar panel modules, metal racking system and support piles, underground electric collection cables, inverters, transformers, a Substation, solar meteorological stations, a supervisory control and data acquisition (“SCADA”) system, electrical interconnect transmission line, and associated access roads (collectively, the “Facility”). The Facility is located in Adams Township in Champaign County, west of N. State Route 235, south of Logan Champaign Road, east of Champaign Logan Shelby Road, and north of Shanley Road.

The Clearview Solar Project plans to utilize Tier 1 modules with a total nominal rating of 144 Megawatts (MW) Alternating Current (AC). For the purpose of this decommissioning cost evaluation, Hull has evaluated the Facility as described in the Clearview’s Solar Project’s Application for a Certificate of Public Need and Necessity, including assuming that 430,345 First Solar Series 6 435W modules will be used for a total nominal rating of approximately 187.20 megawatts (MW) Direct Current (DC) and 144 MW AC. Any changes to the specific number of modules utilized or other minor changes as the Facility reaches final design will not change the overall conclusions of, or decommissioning methods described in, this Decommissioning Study. There may be minor changes to the cost estimate included as Appendix A, which will be updated before the financial assurance described in Section 5.0 is implemented. The purpose of the decommissioning cost evaluation was to review the Facility and to make a recommendation to Clearview Solar I LLC regarding the total cost to retire the Facility at the end of its useful life.

This Decommissioning Study will be updated every five years from the commencement of construction.

1.2 Results

Hull estimates that the Facility should have an expected useful life of approximately 40 years. When the project owner determines that the Facility should be retired, this plan will be used for the decommissioning effort. The decommissioning costs include the costs to return the site to a condition compatible with the surrounding land, similar to the conditions that existed before development of the Facility. Included are the costs to retire the power generating equipment as well as the costs to retire the balance of plant (BOP) facilities. All equipment, structures and supporting components will be removed off-site, with the exception of the underground improvements (i.e. cabling and foundations) which will only be removed to three feet below grade.

The access roads and the Facility Substation surface will be restored to conditions similar to those prior to construction of the Facility. If a landowner prefers to retain an access road for future use, it will not be decommissioned.

Surface water drainage will be restored to conditions prior to construction of the Facility. When the equipment, access roads and foundations (to three feet below grade) are removed and the ground surface restored, final grading will be consistent with agricultural use. Stream crossings will be restored to pre-construction conditions. Ground water resources in this area are generally found at a depth well below any foundations for this project. Construction and decommissioning activities are planned to be well above any groundwater resources. During construction, all wetlands will be avoided, and decommissioning activities will also avoid all wetlands. Therefore, there are no anticipated impacts to surface or groundwater resources and wetlands. If information becomes available at a later date that would suggest that these resources would be affected, it will be addressed in the five-year update to this plan.

All decommissioning work will be conducted under applicable permits and approval as generally outlined within Section 6.0 below.

This document establishes the costs to decommission the Facility without consideration of salvage values; however, the solar panel modules, metal racking system and support piles are assumed to have significant scrap value to a salvage contractor. For this reason, the salvage values have also been separately estimated.

The schedule for completing the decommissioning is estimated to take 6.5 months which consists of 1.5 months of permitting activities and 5.0 months of demolition and restoration activities.

Based on the results of this evaluation, the estimated decommissioning obligation cost for the Clearview Solar Project are as represented within Appendix A.

2.0 PROJECT DESCRIPTION

2.1 Project Introduction

The Clearview Solar Project is planned to consist of large arrays of ground mounted solar panel modules, metal racking system and support piles, underground electric collection cables, inverters, transformers, a Substation, solar meteorological stations, a supervisory control and data acquisition ("SCADA") system, electrical interconnect transmission line, and associated access roads (collectively, the "Facility"). The Facility is located in Adams Township in Champaign County, west of N. State Route 235, south of Logan Champaign Road, east of Champaign Logan Shelby Road, and north of Shanley Road.

2.2 Solar Module Units

The cost evaluation attached as Appendix A is based on the Facility as described in the Clearview Solar Project's Application for a Certificate of Public Need and Necessity, including 430,345 First Solar Series 6 435W modules that will be used for a total nominal rating of approximately 187.20 megawatts (MW) Direct Current (DC) and 144 MW AC. The solar panels will be mounted to a metal racking system with piles that will be driven or rotated into the ground in long rows or "arrays". At the beginning and ending positions of each day, the low end of the solar panels will be one (1) to three (3) feet above the ground surface, and the high end of the panels at eight (8) to fourteen (14) feet above ground surface.

2.3 Underground Electric Collection Cables, Inverters and Transformers

The Facility will include approximately 8.8 miles of buried collection lines and 61 inverters. Solar panels will be grouped into a series of circuits routing through cable trays on the racking to combiner boxes. Power from the combiner boxes will then be transmitted to DC-to-AC inverters, step up transformers and cabinets containing power control electronics. Cables used for transferring electrical power can be located underground or aboveground. The electrical conversion equipment will be mounted on a prefabricated foundation, such as a metal skid and helical piers, or field fabricated foundations. AC power will be delivered through collection lines to the Substation.

2.4 Substation and Interconnection Transmission Line

As stated in Section 2.3, the electrical power from the solar panels will be routed to a central electrical Substation (the Collector Substation). The major components of the Collector Substation will be collection line feeders and breakers, 34.5 kV bus, main power transformer, high voltage breaker, metering/relaying transformers, disconnect switches, enclosure containing power control electronics and a lightning mast. The Substation will be constructed on a concrete foundation, surrounded by a perimeter fence.

A 138 kV electrical interconnect transmission line circuit will connect the Collector Substation to the Point of Interconnect (POI), which is owned and operated by Dayton Power and Light, Inc. (DPL).

2.5 Access Roads

Each solar field will have an access road to support construction and allow for vehicle access to facilitate operations, maintenance, repair and replacement of equipment in addition to providing access for emergency response. The project will include up to 8.3 miles of access roads for construction, operation and maintenance of the solar farm. The access roads would be up to 25 feet wide during construction and then reduced to 16 feet wide during operation. Main access roads that serve the inverters and Substation equipment will likely be surfaced with gravel.

2.6 Solar Meteorological Stations and Supervisory Control and Data Acquisition (“SCADA”) System

The project will include up to six (6) meteorological stations, which include pyranometers, anemometer, wind vane, barometer, rain bucket, temperature probe and associated communications equipment. All equipment will be installed on prefabricated foundations and will be up to fifteen (15) feet in height and will be fenced and gated.

The project will also include a single masonry or metal structure that will house SCADA equipment. It will contain computers communications and other electronic devices to assist in the monitoring and operation of the facility. The SCADA structure will have electrical service, but will not include offices or be occupied, and will not include water or sewer service. The SCADA structure will be constructed on a poured or pre-fabricated concrete foundation, occupy less than 400 square feet, and be less than 15 feet high.

The SCADA system will also include buried fiber optic cable, collocated with the buried medium-voltage collection system, linking the SCADA structure with sensors and or controls located at each inverter, pyranometer, and within the solar array.

3.0 DECOMMISSIONING PLAN

Hull estimates the Facility should have an expected useful life of approximately 40 years. Upon the retirement of the Facility, decommissioning and restoration of the entire Facility will be performed and managed by qualified contractors who have demonstrated relevant experience. The selected contractor will secure all the required permits, schedule the planned activities, and work with waste management firms to segregate materials that can be reused and recycled from those that must be properly disposed of at licensed disposal facilities that operate in accordance with current applicable federal, state and local laws, rules, regulations and ordinances. Advance notification of decommissioning to all stakeholders, including landowners, and other relevant agencies will occur prior to any scheduling of said activities.

During decommissioning and restoration activities, necessary environmental protection measures will be implemented. Activities during decommissioning will be comparable to the construction phase, including the use of heavy equipment onsite, preparing staging areas, and restoring areas that were disturbed during work activities. With that being said, best management practices regarding erosion and sedimentation controls will be implemented, as well as dust and noise mitigation controls. Additionally, contingency plans will be in place for unforeseen conditions and spills. A project specific Health & Safety Plan (HASP) will be prepared by the respective contractors and be available onsite. All assigned personnel will have participated in the contractor defined safety training programs associated with this type of work. This HASP will address employee health and safety during planned activities, personal protective equipment, identify safety procedures and protocols and include a section describing emergency response and communication plans. Daily jobsite safety analysis (JSA) will be conducted each morning identifying planned activities, potential hazards and the associated engineering controls/hazard mitigation measures.

Additionally, contractors shall be obligated to maximize the salvage value for the overall project and all recyclable materials, salvaged and non-salvaged, shall be recycled to the furthest extent possible.

See below for a description of the individual Facility components and the proposed plan for decommissioning these components. The Facility will be deenergized and isolated from all external electrical lines in coordination with the appropriate utility prior to commencing removal and recycling activities.

3.1 Solar Module Units

All modules will be disconnected, removed from the racking, carefully packaged and transported to a designated location for resale, recycling or disposal. The connecting cables and combiner boxes will be disconnected and removed. The steel racking system supporting the solar modules will be unbolted and disassembled by laborers using standard hand tools and possibly assisted by mechanical equipment. All

steel support structures will be completely removed by mechanical equipment and transported offsite for salvage or reuse. Any demolition debris that is not salvageable will be transported offsite to licensed disposal facilities, operating in accordance with current applicable federal, state and local laws, rules, regulations and ordinances. Vehicles used for transport will be legal weight and dimensions. All piles shall be removed by the pull-out method from the site, and if sections of piles detach during this operation, sections will be removed if they are within 3 feet of the existing ground surface.

3.2 Underground Electric Collection Cables, Inverters and Transformers

Decommissioning will require dismantling and removal of electrical equipment, including above ground cables, inverters and transformers. Buried collection cables more than 3 feet below grade will not be removed. All electrical equipment will be removed from the Project property and transported offsite. Concrete foundations and support pads will be broken up by mechanical equipment, loaded onto dump trucks and removed from the site. Vehicles used for transport will be legal weight and dimensions, with the exception of some larger electrical equipment that may require special hauling permits. Prior to removal of the transformers, any oil will be pumped out into a separate industry approved disposal container and sealed to prevent any spillage during storage and/or transportation. It is expected that any oils will be recycled and reused. Equipment and materials are expected to be salvaged for resale or scrap value depending upon market conditions.

3.3 Substation and Interconnection Transmission Line

The equipment in the Collector Substation and surrounding fencing will be removed and the demolition contractor will take ownership of the equipment with all salvage value to be retained by the demolition contractor. It is assumed that the salvage value of this electrical equipment will be used to offset the demolition costs. All Substation fencing will be removed, loaded into a dump truck or trailer, and recycled or reused. The underground cabling for the power collection system is assumed to be buried at a depth of greater than three feet, and therefore will be abandoned in place. The Facility owner will contact the applicable regional transmission organization and interconnection utility prior to decommissioning to manage/coordinate efforts to ensure no disruption to the electrical grid.

3.4 Access Roads

For purposes of this study, it is assumed that all of the access roads will be removed as part of the decommissioning of the Facility. This will include removal of the aggregate surface, geotextile materials and any modified subgrade material. Areas where aggregate surfacing has been removed will be decompacted and spread with topsoil. The decommissioned areas, inclusive of the access roads, will be graded to contours consistent with pre-construction topography to ensure suitable surface drainage, and

restore drainage patterns. The removed aggregate will be loaded into a dump truck and the demolition contractor will take ownership of the aggregate.

Participating landowners may choose to retain roads for their own use following decommissioning, so prior to any removal activities landowners will be directly contacted and their intentions will be properly documented.

3.5 Solar Meteorological Stations and Supervisory Control and Data Acquisition (“SCADA”) System

The equipment, prefabricated foundations and surrounding fencing within the Solar Meteorological Stations will be removed by mechanical equipment and the demolition contractor will take ownership of the equipment with all salvage value to be retained by the demolition contractor. It is assumed that the salvage value of this electrical equipment will be used to offset the demolition costs. All fencing will be removed, loaded into a dump truck or trailer, and recycled or reused.

The structure, equipment, prefabricated foundations and surrounding fencing for the SCADA system will also be removed by mechanical equipment and the demolition contractor will take ownership of the equipment with all salvage value to be retained by the demolition contractor. It is assumed that the salvage value of this electrical equipment will be used to offset the demolition costs. The buried fiber optic cable for the SCADA system is assumed to be buried at a depth of greater than three feet, and therefore will be abandoned in place. All fencing will be removed, loaded into a dump truck or trailer, and recycled or reused.

4.0 SITE RECLAMATION

Once the removal of all equipment and site demolition is complete, site reclamation activities will commence. Agricultural areas will be restored to conditions prior to site disturbance, unless another use is more appropriate or desired by the respective landowners. The decommissioned areas, inclusive of the access roads, will be final graded consistent with agricultural use to ensure suitable surface drainage and restore drainage patterns. In areas where topsoil was removed during construction, topsoil will be redistributed to provide similar ground cover that was present prior to site disturbance. Prior to preparing for seeding, any areas where the soil has been compacted by decommissioning activities shall be decompacted prior to placing topsoil and preparing the seed bed. Decompaction can be performed with a disk for shallow compaction or a winged subsoiler or straight ripper shank for areas that may have been compacted to deeper depths.

Soil quality should not be greatly impacted by the solar development, due to solar facility maintaining vegetative ground cover throughout the life of the Project. Maintenance during operation would include mowing activities and leaving grass cuttings in place to decompose. The decomposed organic material would then be naturally added to the existing soils. Disturbed areas will be seeded and mulched to provide vegetative cover to minimize erosion of topsoil. Seed mixes and other materials used will be acquired in quantities sufficient to complete any revegetation work necessary following decommissioning. Ideally, seeding will occur in the fall before first frost or early spring just before the last frost. The average frost-free growing season for the Project Area is mid-April through the end of October. Sources of guidance for seeding and mulching, including watering, mowing, and repairing include the Ohio Rainwater and Land Development Manual (Ohio Department of Natural Resources, 2006) and the Ohio Department of Transportation. (Ohio Department of Transportation , 2020).

Any agricultural drainage tiles impacted during the decommissioning activities will be restored to conditions prior to site disturbance. Impacted drainage tiles during construction, operation and/or maintenance of the Facility should have been timely addressed during those specific activities. Field tile systems that may be damaged during decommissioning activities shall be promptly repaired no later than 30 days after such damage is discovered. Tile installation or repairs shall be performed, to the extent practical, in accordance with applicable provisions of the current version of the Standard Practice for Subsurface Installation of Corrugated Polyethylene Pipe for Agricultural Drainage or Water Table Control, ASTM F449-02 (2008).

5.0 DECOMMISSIONING COSTS

The Facility owner will provide for financial security to ensure that funds are available to decommission the Facility and restore the Project Area. Based on the results of this evaluation, the estimated decommissioning obligation cost for the Clearview Solar Project are as represented within Appendix A.

6.0 DECOMMISSIONING SCHEDULE AND PERMITS

The schedule for completing the decommissioning is estimated to take 6.5 months which consists of 1.5 months of permitting activities and 5.0 months of demolition and restoration activities.

This estimated schedule includes multiple demolition and restoration crews to restore all areas to a condition prior to being disturbed. Essentially all of the land being used by the Facility was previously agricultural lands, so the intended future use of the land following reclamation is for it to return to agricultural use with the specific agricultural use to be at the discretion of the landowner.

The structure demolition and the restoration crew will consist of the following personnel per crew:

Structure Demolition Crew:

- machine operators;
- laborers;
- multiple truck operators for hauling; and
- general Superintendent.

Restoration crew:

- machine operators;
- laborers; and
- multiple truck operators for hauling.

At a minimum, the following permits, plans, and/or approvals will likely be required prior to initiating demolition activities:

- Health & Safety Plan Development;
- Demolition Permit;
- Road Use and Maintenance Agreement (RUMA);
- Waste Disposal Plan;
- NPDES General Permit for Storm Water Associated with Construction Activities and a Stormwater Pollution Prevention Plan (SWPPP); and
- Air Monitoring (Dust) Plan/Equipment Mobilization.

While the above list is intended to cover the major permits and approvals that will likely be required, local requirements and changes in regulatory requirements over time may require additional site-specific permits and/or approvals that may not be listed above. A detailed study is recommended as part of the normal pre-demolition planning activities to confirm the exact permitting requirements that may be needed to execute the work.

A schedule for this work is provided in Appendix B.

7.0 DECOMMISSIONING ASSUMPTIONS

The following assumptions were made as the basis for the cost estimates:

1. The cost estimate is based upon typical industry and market conditions as of the date of this estimate. Natural disasters, homeland security escalation, inflation, financing, and other unforeseen circumstances can cause sudden increases in material and labor costs.
2. It is recognized that neither Hull & Associates, LLC nor its Client has control over the cost of labor, materials or equipment, or over the Contractor's methods of determining bid prices and competitive bidding or negotiating conditions.
3. The costs were based on a standard work shift and does not include premiums for work required to be completed during off hours or weekends.
4. The estimate does not include contractor standby time.
5. The estimate assumes that contractors will have full access to all work areas at the scheduled time of work and does not include delays associated with gaining access.
6. No hazardous construction material abatement is required.
7. No environmental costs have been included to address site cleanup of contaminated soils, hazardous materials, or other conditions present on-site having a negative environmental impact.
8. All solar module units, racking, piles, above ground electric cables, inverters, transformers, collection Substation equipment, and solar meteorological equipment are removed from the Project by the demolition contractor and ownership transferred to the contractor with all salvage and scrap value to be retained by the contractor.
9. No buildings are included in the site demolition activities.
10. All fencing is removed as part of site demolition activities.
11. Underground electrical power collection system cabling will be abandoned in place as it is assumed to be greater than three feet below finished grade.
12. All equipment foundations will be removed to a minimum of three feet below finished grade.
13. All crushed rock surfacing around equipment and all crushed rock surfacing associated with the access roads will be removed.
14. During decommissioning efforts, public road improvements were not anticipated due to legal load limits (weight, size) or special hauling permits being adhered to.
15. Topsoil that has been stockpiled at the site will be re-graded in areas where crushed rock surfacing and foundations have been removed to achieve suitable site drainage to natural drainage patterns. All disturbed site areas will be graded. In all areas where the ground has been disturbed as part of decommissioning activities, the ground will be seeded to prevent erosion, but no watering of the seeded areas is included. It is assumed that work will be completed in the Spring or Fall.

8.0 STANDARD OF CARE AND LIMITATIONS

Hull has performed its services using that degree of care and skill ordinarily exercised under similar conditions by reputable members of its profession practicing in the same or similar locality at the time of service. No other warranty, express or implied, is made or intended by our oral or written reports. The work did not attempt to evaluate past or present compliance with federal, state, or local environmental laws or regulations. Hull makes no guarantees regarding the completeness or accuracy of any information obtained from public or private files or information provided by subcontractors.

APPENDIX A

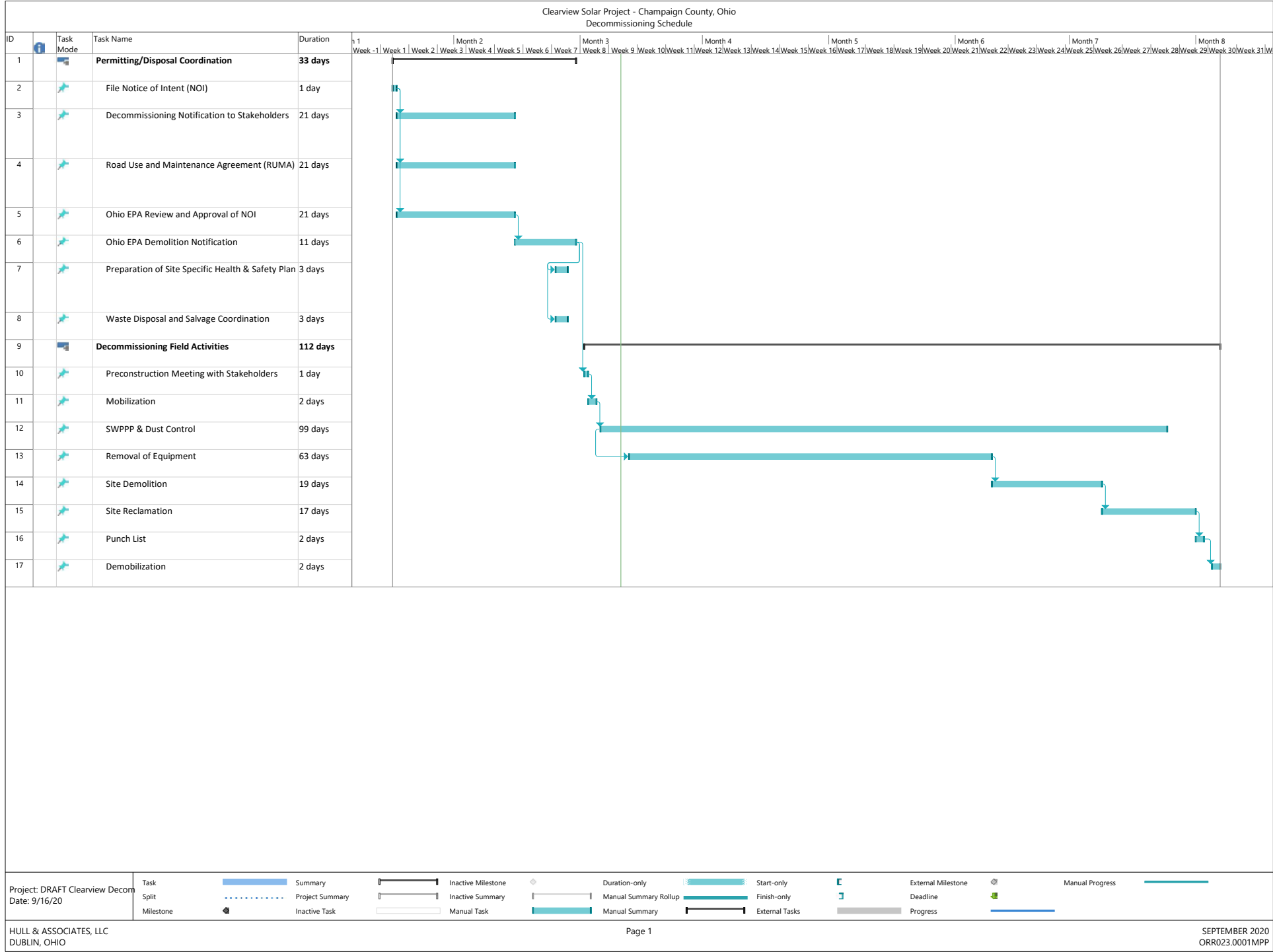
Decommissioning Cost Evaluation

**Clearview Solar Farm Project
Champaign County, Ohio
Decommissioning Obligation Cost Evaluation**

<u>Description</u>	<u>Duration (weeks)</u>	<u>Cost</u>	<u>Recycling Value</u>	<u>Total Cost</u>
Mobilization/Demobilization/ General Conditions	18.0	\$355,000	0	\$ 355,000
Health & Safety	18.0	\$27,000	0	\$ 27,000
SWPPP & Dust Control	18.0	\$203,000	0	\$ 203,000
Removal of Equipment	11.5	\$8,328,325	(\$6,475,398)	\$1,852,927
Site Demolition	3.5	\$227,000	(\$502,373)	(\$275,373)
Site Reclamation	3.0	\$3,200,000	0	\$3,200,000
Totals excluding 10% Contingency		\$12,340,325	(\$6,977,771)	\$5,362,554
10% Contingency				\$ 536,255
Total inclusive of 10% Contingency				\$5,898,809

APPENDIX B

Project Schedule



This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/17/2020 6:07:42 PM

in

Case No(s). 20-1362-EL-BGN

Summary: Application - Part 12 of 31 Ex. J Preliminary Decommissioning Plan electronically filed by Christine M.T. Pirik on behalf of Clearview Solar I, LLC