Decommissioning and Site Restoration Plan

South Ripley Solar

Town of Ripley

Chautauqua County, New York

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1.0 INTRODUCTION

On April 21, 2023, the Office of Renewable Energy Siting and Electric Transmission (ORES) issued a Siting Permit to ConnectGen Chautauqua County LLC (Permittee), an affiliate of Repsol Renewables North America, for a 270-megawatt major renewable energy facility (Project or Facility) located on private lands in the Town of Ripley, Chautauqua County, New York (Facility Site).

This Final Decommissioning and Site Restoration Plan (the Plan) is based on the permitted design and provides updated cost estimates that are reflective of 2025 prices. The Plan will be updated after one year and five years of Facility operation and updated every fifth year thereafter to reflect any changes in market rates and prices, and regulatory requirements, and also to consider new developments in technology and site restoration methods.

Project construction is expected to begin in the first quarter of 2026 and is expected to take 12 to 18 months to complete. The Project is expected to reach commercial operation by the end of 2027. The Permittee expects the Facility to operate up to 35 years before being decommissioned. Decommissioning, demolition, and dismantling of the Facility and site restoration has an estimated duration of 40 weeks.

1.1 Purpose of the Plan

This plan describes the following:

- The potential future use and aesthetics of the Facility Site beyond its initial contract period
- The decommissioning activities and schedule, including the location and timing of site rehabilitation and restoration for areas disturbed by the Project, and the management of excess materials and waste during dismantling and decommissioning of the Facility
- Potential negative environmental impacts due to decommissioning and their mitigation measures
- Site safety and security during decommissioning
- Notification to inform the public of Facility decommissioning
- Decommissioning costs and financial assurances
- The local and state permits and approvals which may be required at the time of decommissioning.

2.0 PROBABLE FUTURE USE OF THE FACILITY SITE

The Facility is anticipated to have an operational lifespan of up to 35 years. At the end of the Facility's lifespan, Facility components are expected to be decommissioned, as described herein. However, if there is a continued local, state, or federal need for renewable energy production at the site and Project economics remain viable at the end of the Facility lifespan, the Facility may be "repowered" with new technology and

continue operating for an extended period. A repower of the system would require additional or updated land agreements, state permitting approval, and renewed local agreements not covered under this Application.

The Permittee will perform decommissioning in a manner consistent with allowable future intended use of land within the Facility Site. The Facility Site is currently primarily active agriculture and forested land. At the end of life, if decommissioning is determined to be the most optimal option for the site, as opposed to repowering, lands previously used for agricultural production may resume upon decommissioning. Since the parcels hosting the Facility are privately owned, post-decommissioning, the underlying landowners may choose to return their land to a variety of uses which may include farming, residential housing, or commercial use. The operation of a solar facility and planned decommissioning will not inhibit future land use options.

3.0 NOTICING

The Permittee will provide notification to the town, county, impacted landowner(s), and all other required parties at least two weeks prior to the commencement of any decommissioning activities or site restoration. Notification may be in the form of letters, newspaper notices, and updates on the Project website.

4.0 ENVIRONMENTAL PROTECTION MEASURES

Decommissioning activities could result in environmental impacts similar to those that occur during the construction phase. For example, there is the potential for disturbance (e.g., erosion and sedimentation) to adjacent watercourses or other sensitive environmental features. As such, many of the mitigation measures, management practices, and permitting requirements applied during construction would be applied during decommissioning, including construction requirements outlined in the New York State Department of Agriculture (NYSAGM) Guidelines for Solar Projects. This would include, as appropriate, erosion and sediment control plans, air quality and noise mitigation requirements, traffic management plans, spill prevention control and containment plans, and permits for work in wetlands and waterbodies.

Erosion control and stormwater management during site reclamation will utilize similar measures and best management practices (BMPs) outlined in the Project's stormwater pollution prevention plan and in accordance with New York State Standards and Specifications for Erosion and Sediment Control in order to maintain downstream water quality and manage stormwater runoff during decommissioning of the Facility. Selection and design of erosion and sedimentation controls will account for climate, topography, soils, and vegetative cover to be re-established at the Facility Site following decommissioning. Commonly used BMPs that may be employed at the site during restoration will include the following:

- Minimize disturbed areas and protect natural features of the site (native soil, topsoil, vegetation, topography, and drainage areas).

- Control stormwater runoff and flow to and from disturbed areas.
- Stabilize soils as quickly as possible following disturbance of work areas.
- Protect slopes and exposed soil.
- Protect culvert inlets, drainage structures, and nearby surface water features.
- Establish perimeter controls around areas to be restored.
- Retain sediment to prevent transport off-site in stormwater runoff.
- Maintain controls including removal or accumulated sediment during re-establishment of vegetation.

Environmental protection plans, permitting requirements, and other measures will remain in place, as needed, until the site is stabilized to mitigate erosion and silt/sediment runoff and any impacts to natural features or waterbodies located within and adjacent to the Facility Site.

The Permittee will hire an Environmental Monitor (EM) with an understanding of state and federal regulations, BMPs and agricultural practices. The Permittee will coordinate with the EM to ensure compliance with all applicable requirements during the decommissioning phase. All decommissioning and restoration activities will be performed as per the requirements of applicable state regulations and laws in effect at the time of decommissioning.

5.0 FACILITY COMPONENT DISMANTLING AND REMOVAL

5.1 Decommissioning During Construction (Abandonment of Project)

In the unlikely event that construction cannot be completed and decommissioning of the Project is initiated during the construction phase, all applicable environmental protection and restoration procedures would be followed.

If the site has been cleared and/or excavated in preparation for the installation of Facility infrastructure, appropriate environmental protection measures would be implemented to prevent topsoil erosion as the site is decommissioned and stabilized. The extent of work required to decommission the site and the associated environmental protection measures required would be dependent on the progress made at the time of Project abandonment and would be determined through site inspections by qualified specialists.

5.2 Decomissioning after Ceasing Operation

It is assumed that the Facility will be decommissioned at the end of its operational lifespan. However, decommissioning may also be triggered if the Facility is non-operational for a continuous period of 12 months or more.

5.3 Pre-Dismantling Activities

At the end of the Facility's useful life, it will first be de-energized and isolated from all external electrical lines. Prior to any dismantling or removal of equipment, staging areas would be delineated at appropriate locations within the Facility Site, including near the Project substation and inverter locations.

Temporary erosion and sedimentation control measures will be installed prior to decommissioning and in accordance with any Project-specific erosion and sediment control plans developed for the decommissioning phase of the Facility. These measures will be enacted with consideration of industry standard practices.

5.4 Equipment dismantling and Removal

The following subsections describe the process that will be undertaken to remove Facility components. This Plan and the associated cost estimate assume that all Facility components will be removed during decommissioning aside from select exceptions as detailed below.[1]

See Section 6 for a description of site rehabilitation and restoration practices that will be implemented during and after equipment dismantling and removal.

Solar Panels, Racking, Piles

The Facility will include the installation of solar panels mounted on galvanized steel piles with a steel racking system. Each panel will be disconnected from the electrical system and unfastened from the mounting rack. After hand removal of the panel from the rack, modules will be placed face down on pallets with taped wire ends and tied down for transport via skid-steer to staging location. Modules will then be placed in a vehicle or container for transportation off-site for recycling or disposal, following applicable local, state, and federal regulations.

The racking system that supports the solar panels will be disassembled and removed from the site. The metal racking components may be reused or recycled for future use. Piles will be pulled out of the ground where conditions allow, otherwise cut at a minimum of 4 feet below grade or flush with the top of shallow bedrock.

Consistent with the 2019 NYSAGM Guidelines, all surface components and subsurface components, including those related to foundations, will be removed to 4 feet below the soil surface, flush with the top of shallow bedrock if less than 4 feet deep, or to the depth originally installed if less than 4 feet. Where feasible, some Facility components that are located below 4 feet depth (such as piles or concrete footings) may be completely removed from the ground.

[1] Note: Exceptions to this rule may be provided where written requests are received from landowners to leave all or portions of Facility components in place for use by the landowner. as may be allowed by federal, state, and local laws at the time of decommissioning.

Electrical Equipment and Collector System

Inverters and step-up transformer skids, including associated piling, will be removed and will be shipped off site for eventual reuse,[2] salvage, or disposal. The piles and associated foundations will be removed from the site and disposed or recycled.

Underground collector cables are anticipated to be installed to a depth greater than 4 feet across the Facility Site and therefore will be left in place. In shallow bedrock conditions, where cable is buried between 2 feet to 4 feet below the ground surface and below the top of bedrock, it will be removed. Overhead power lines will be removed, poles included.

Collection Substation

Unless the Project Collection Substation is independently required for operation of the local National Grid owned transmission system, all above ground structures and electrical equipment including circuit breakers, chain link fencing, control building(s), overhead lines connecting to the point of interconnection (POI), and grounding grid would be removed, and any concrete foundations would be removed to at least 4 feet below grade. All granular materials would be removed from the Facility Site by a dump truck or placed in a designated on-site area for use by the landowner. Geotextile materials would be sent for disposal. All electrical system components will be taken off-site for reuse, salvage, or disposal.

Point-of-Interconnection

The POI, a new 230 kV three-ring breaker switching station tapping the existing National Grid 230 kV Dunkirk to South Ripley transmission line will be transferred to National Grid ownership upon the commencement of Facility operations and will not be decommissioned under this Plan. National Grid will be responsible for the long-term operations and maintenance decisions associated with the POI and will be responsible for potential removal and restoration.

Access Roads

Unless a host landowner requests that an access road be left in place for use after Facility decommissioning, all access roads are assumed to be gravel and will be removed by skid-steer with sweeper. Material will be transported via dump truck to a staging area for disposal or reuse.

Water crossings will be removed using appropriate erosion and sediment control (ESC) measures (silt fences, diverting flow, etc.). Once ESC measures are in place, road aggregate and culverts will be removed by excavator.

Storage Infrastructure, Landscape Plantings, and Perimeter Fence

[2] Decommissioning cost estimate will not assume reuse or resale for reuse of equipment.

Equipment storage, operation infrastructure, and any associated temporary decommissioning improvements (e.g., temporary construction trailer) used during the decommissioning phase will be removed from the site by truck. Any foundations associated with these facilities would be removed to a depth of at least 4 feet below grade or to the depth originally installed if less than 4 feet. Perimeter fencing would be removed and recycled, reused, or disposed of. Unless the landowner requests removal of the installed landscaping modules surrounding the Facility, they will be left in place, to the extent allowed by Federal, State and Local laws.

6.0 SITE REHABILITATION/RESTORATION

6.1 General Rehabilitation/Restoration Practices

At the time of decommissioning, rehabilitation activities will be conducted in accordance with applicable NYSAGM Guidelines and local laws. Restoration measures that will be implemented to restore all disturbed areas to pre-construction conditions will generally include, but will not be limited to, the following:

- Ground disturbance will be minimized to the extent practical.
- The site will be restored to meet adjacent ground contours to the extent practical. This may include re-grading access roads and other features in specific areas to restore drainage patterns and reestablish preexisting contours.
- During road removal activities, culverts and drainage infrastructure will also be removed; streams or drainage channels will be restored to preexisting elevations and stabilized in accordance with New York State Erosion Control standard practices.
- Drainage tile that existed within the Facility Site at the initiation of the Project and was impacted by the Project will be restored to the same or better condition than existed prior to Facility construction.
- Soils stockpiled during site restoration will be used in the restoration and not transported off-site. Excess soils will be used for balancing and distributing across various locations during restoration.
- Access roads and other areas which may become compacted during operation or decommissioning will be de-compacted. Decommissioning standards established in the NYSAGM Guidelines will be adhered to, where applicable.
- Topsoil will be redistributed to provide substantially similar ground cover as was present within the areas prior to site disturbance.
- Disturbed areas will be seeded by the Permittee with the appropriate species to prevent topsoil erosion, unless seeding is immediately applied by the landowner. In the event the land is

intended to return to agricultural production, the re-seeding of the land will be coordinated with the landowner or agriculture producer.

- Site restoration will include proper pre-seeding preparation of the soil surface and topsoil prior to application of approved, native seed mix.
- Areas that were previously not developed or used for agriculture will be revegetated using native plant material and seeds appropriate for the Facility Site or allowed to revegetate naturally.
- ESC measures will be left in place, as needed, until the site is stabilized.

6.2 Watercourses

Any proposed decommissioning activities that could result in impacts to wetlands or surface waters (e.g., culvert removal) would be coordinated with the appropriate agencies, as necessary, to determine applicable guidelines, permitting, and site-specific mitigation and/or remediation plans. Similar mitigation and monitoring measures implemented during construction will be used during the decommissioning of the Facility.

6.3 Spills

Although strict spill prevention and spill response procedures will be in place throughout the lifespan of the Facility, including decommissioning, there is the potential for small spills to occur. Spill control and countermeasures will be outlined in a Spill Prevention Control and Countermeasures Plan developed in support of the specific decommissioning activities.

Hazardous materials or waste will not be stored on-site during operation and maintenance of the Facility. Provided the Facility is operated and maintained in accordance with industry best practices there should be no significant environmental liabilities associated with Facility decommissioning.

6.4 Excess Materials & Waste Management and Recycling

Prior to decommissioning of the Facility, the Permittee will complete a waste audit and prepare a waste reduction work plan in accordance with any relevant regulations in effect at time of decommissioning. Typical waste materials and modes of disposal, recycling or reuse are presented in Table 1.

Table 1. Typical Facility Decommissioning Waste Materials and Modes of Disposal

Component	Typical Mode of Disposal
Concrete foundations	Crush and disposed of off-site.
Solar Panels	Reuse, recycle/salvage or dispose. Assumed 5% breakage, salvage value as e-waste for crystalline.

Component	Typical Mode of Disposal
Steel racks and mounts	Salvage for reuse or recycle for scrap.
Cabling	Assumed salvage value for recycle.
Inverter step-up transformers, inverters and circuit breakers	Salvage for reuse, recycle for scrap, or dispose.
Granular material	Reuse or dispose in landfill.
Oils/lubricants	Oil drained from components and recycled or disposed in accordance with State and local regulations.
Hazardous materials, if applicable	Dispose through licensed hauler at appropriate facility.
Geotextile material	Dispose in landfill.
Miscellaneous non-recyclable materials	Dispose of in landfill.
Inverters	Salvage for reuse or recycle for scrap.
Transformers	Salvage for reuse or recycle for scrap.

*Note that decommissioning cost estimate does not assume equipment resale for reuse per ORES requirements.

Major pieces of equipment may be recyclable or salvageable. The galvanized steel racks may be sold for scrap, reused, or recycled. Electrical equipment, including inverter electronics, could either be salvaged for reuse or recycled. Components within transformers and cables would have a high salvage value due to copper, steel, and aluminum content. Concrete from footings could be crushed and disposed of off-site with no assumed salvage value. Spent oils, if any, could be recovered for recycling through existing oil reprocessing companies.

As much of the Facility would consist of reusable or recyclable materials, residual waste for disposal would be relatively limited as a result of decommissioning the Facility. Small amounts of registerable waste materials would be managed in accordance with applicable regulations. Residual non-hazardous waste would be disposed of at a licensed landfill in operation at the time of decommissioning.

7.0 SITE SAFETY AND COMMUNICATIONS

Site safety and communications programs, plans, and procedures filed by the Permittee as part of the Application or compliance filings during the construction and operation of the Facility will be updated, as needed, for the decommissioning of the Facility. These plans will address health and safety, site security, emergency response procedures, and communications and monitoring.[3]

8.0 OTHER APPROVALS

The Permittee will obtain all necessary approvals in effect at the time from appropriate government and

[3] See the Site Security Plan and Safety Response Plan submitted with the Section 94-c Application for general examples of the site safety plans that will be applicable during decommissioning.

regulatory bodies.

9.0 SCHEDULE

Once a decision is made that the Facility is to be decommissioned and all preliminary steps have been taken (e.g., de-energizing), the schedule for the decommissioning process will generally follow the approach outlined in Table 2. Decommissioning, demolition, and dismantling of the Facility and site restoration has an estimated duration of 40 weeks from the date of abandonment or discontinuance of operations and should not occur during the winter months or require multiple mobilizations. This timeline may be extended if there is a delay beyond the control of the Permittee including, but not limited to, inclement weather conditions, planting requirements, equipment failure, or the availability of equipment or personnel to support decommissioning. The Permittee will engage one or more reputable contractors to perform the Facility decommissioning.

Table 2. Schedule for the Completion of Major Milestones in the Decommissioning Process

Milestone	Time Requirement
Mobilization, Site Preparation	4 weeks
PV Array, collector system, Substation removal	20 weeks
Civil, roads, grading	8 weeks
Restoration	8 weeks
Total	**40 weeks**

10.0 DECOMMISSIONING COSTS AND FINANCIAL ASSURANCE

The decommissioning cost estimate detailed in Table 3 has been prepared by Fisher Associates and is an estimate of probable costs to decommission the Facility as of August 2025. Table 3 contains the cost breakdown of Facility components, including the photovoltaic (PV) plant, POI substation, collector substation, overhead lines, as well as costs associated with offsite disposal and salvage values. Costs were updated to reflect 2025 values utilizing the CPI Inflation calculator from the U.S. Bureau of Labor Statistics. Per the calculator, it is estimated that inflation raises the price of both decommissioning and salvage by about 11.26%. Costs included in January 2022 Site Restoration and Decommissioning Plan are provided for reference.[4]

Financial assurance will be provided prior to the start of construction in the form of a letter of credit or other form of security reasonably acceptable to the town. Per the South Ripley Solar Project Host Community Agreement approved by the Ripley Town Board on December 30, 2021, the amount in the letter of credit or other security will be equal to the gross decommissioning and site restoration estimate (which is the overall decommissioning and site restoration estimate plus a fifteen (15) percent contingency

[4] Some updates were made to the 2022 costs to correct miscalculations identified in the version of Table 3 included in the January 2022 Site Restoration and Decommissioning Plan.

cost, see Table 3). In the event of default upon performance of such conditions outlined in this Plan, after proper notice and expiration of any cure periods, the letter of credit or other security shall be forfeited to the town, which shall be entitled to maintain an action thereon. The letter of credit or other security shall remain in full force and effect until restoration of the property.

Table 3. Decommissioning Cost Estimate

Decommissioning Cost (Gross)

Description	Quantity	Unit Price January 2022	Unit Price August 2025	Total 2022	Total 2025
PV Modules (560 W)	617,750	$ 2.65	$ 2.99	$ 1,637,037.50	$ 1,847,072.50
PV Inverter(s) (0.1309 MVA)	2,058	$ 210.00	$ 236.64	$ 432,180.00	$ 487,005.12
PV Transformer(s)	94	$ 786.00	$ 885.71	$ 73,884.00	$ 83,256.74
Racking Frame (Fixed Tilt)	12,355	$ 919.00	$ 1,022.48	$11,354,245.00	$ 2,632,732.99
Racking Posts	140,624	$ 22.00	$ 24.48	$ 3,093,728.00	$ 3,442,081.77
Racking Wiring	0	$ -	$ -	$ -	$ -
Underground Cable (LV, MV, Comm) (LF)	7,604,748	$ 0.19	$ 0.21	$ 1,444,902.12	$ 1,607,598.10
PV Plant Fence (LF)	1,005,295	$ 1.67	$ 1.86	$ 1,678,842.65	$ 1,867,880.33
Interconnection Facilities (LS)	260,000	$ 7.57	$ 8.42	$ 1,968,200.00	$ 2,189,819.32
Concrete (LS)	1	$ 2,413,686.27	$ 2,685,467.34	$ 2,413,686.27	$ 2,685,467.34
Gravel (CY)	6,276	$ 9.00	$ 10.01	$ 56,484.00	$ 62,844.10
Offsite Hauling (CY)	34,044	$ 3.00	$ 3.34	$ 102,132.00	$ 113,632.06
Offsite Disposal (LS)	1	$ 1,321,416.00	$ 1,470,207.44	$ 1,321,416.00	$ 1,470,207.44
General Conditions (Includes all equipment cost) (LS)	1	$ 1,848,097.00	$ 2,056,192.72	$ 1,848,097.00	$ 2,056,192.72
Re-Seeding (AC)	1,500	$ 707.00	$ 786.61	$ 1,060,500.00	$ 1,179,912.30
Re-Grading (CY)	0	$ -	$ -	$ -	$ -
Erosion and Sediment Control (LS)	1	$ 1,178,366.00	$ 1,311,050.01	$ 1,178,366.00	$ 1,311,050.01
Contingency	15%			$4,449,555.08	$ 4,955,512.93
Total Gross Decommissioning Cost				**$34,113,255.62**	**$37,992,265.78**

Salvage Value

Description	Quantity	Unit Price January 2022	Unit Price August 2025	Total 2022	Total 2025
PV Modules (560 W)	617,750	$ 14.00	$ 16.65	$ 8,648,500.00	$ 10,285,537.50
PV Inverter(s) (0.1309 MVA)	2,058	$ 58.00	$ 3,564.64	$ 119,364.00	$ 7,336,029.12
PV Transformer(s) (0.1309 MVA)	94	$ 4,144.00	$ 3,062.88	$ 389,536.00	$ 287,910.72
Racking Frame (Fixed Tilt)	14,555,140	$ 0.20	$ 0.07	$ 2,911,028.00	$ 1,018,859.80
Racking Posts (LBS)	23,202,960	$ 0.20	$ 0.07	$ 4,640,592.00	$ 1,624,207.20
Interconnection Steel Structures (LBS)	650,656	$ 0.20	$ 0.07	$ 130,131.20	$ 45,545.92
Interconnection Power & Instrument Transformers (LBS)	164,034	$ 0.20	$ 0.07	$ 32,806.80	$ 11,482.38
Interconnection Disconnect Switches (1 & 3-Phase) (LBS)	34,746	$ 0.66	$ 3.51	$ 22,932.36	$ 121,958.46
Interconnection Primary Conductor (LBS)	143,806	$ 0.66	$ 3.51	$ 94,911.96	$ 504,759.06
Interconnection Pre-Fab Steel Building (LBS)	69,000	$ 0.20	$ 3.51	$ 13,800.00	$ 242,190.00
Control Panels (LBS)	4,600	$ 0.20	$ 0.07	$ 920.00	$ 4,830.00
Electronic Controls (LBS)	1,658	$ 0.25	$ 0.30	$ 414.50	$ 1,380.00

Description	Quantity	Unit Price January 2022	Unit Price August 2025	Total 2022	Total 2025
LV Wiring (PV Plant & Interconnection) (LBS)	351,505	$ 1.83	$ 1.91	$ 643,254.15	$ 3,166.78
MV Wiring (LBS)	1,824,105	$ 1.43	$ 3.51	$ 2,608,470.15	$ 1,233,782.55
Chain Link Fence (PV Plant & Interconnection) (LBS)	3,970,442	$ 0.20	$ 0.07	$ 794,088.40	$ 277,930.94
Total Salvage Value				**$21,050,749.52**	**$22,999,570.43**
Total Net Decommissioning Cost				**$13,062,506.10**	**$14,992,695.35**