

Decommissioning Plan

KCE Battery Storage Site Description

The KCE Battery Storage Facilities consist of approximately 4 acres of land located in the Towns of Willington, Connecticut. The subject property is in the residential (R-80) zone and is located within a rural residential portion of town east of the Willimantic River. The eastern portion of the property is currently used for agriculture and the western portion of the property, including the proposed project area, is wooded. The Property at the project location is elevated and generally flat. The topography west of the project area slopes to the west and stormwater runoff flows west.

The 5 MW/20 MWh battery energy storage system will consist of lithium-ion batteries installed in battery racks and connected in both series and parallel. The batteries will be housed within battery containers constructed on a concrete slab and will include two Sungrow SC3150-MV-US inverters with twelve Sungrow ST2752UX-US, 2.752MWh battery containers. Batteries will be connected to inverters via underground conduit.

Current Conditions

The proposed project site is wooded and unused. An existing woods road traverses the Property and the neighboring property leading to the general project location. This road will be improved and used for access to the proposed Project.

Decommissioning and Restoration Plan

The Plan for decommissioning and restoration of the Project (Plan) is discussed below. Credits associated with salvage or resale values are expected to exceed costs of removal. The Petitioner has prepared the Plan to outline the methods and means to decommission the Project at the end of the Project's useful life. The purpose of the Plan is to identify the methodology to be used to mitigate potential impacts resulting from the cessation of operations of the storage facilities. Decommissioning and restoration activities will adhere to the applicable requirements of the CSC and any effective decommissioning agreements.

The Project will have an expected economic and technological lifetime of approximately thirty years. At the end of its life the Project will be decommissioned, and the Storage Facilities, ancillary equipment, buildings, and infrastructure will be subsequently removed. In general, facility decommissioning is in the reverse order of facility construction.

Actual decommissioning would proceed in phases and be implemented as appropriate: removal of specialized equipment; removal of hazardous and regulated materials; disconnecting power and other utilities; removal of equipment; structural demolition; removal of concrete slabs and foundations, underground piping, and utilities (to the extent necessary); and site restoration. For removal of specialized installations, electrical equipment would be de-energized and hazardous materials associated with that equipment would be removed. Modular equipment will be removed as modular components in the same manner as with the original delivery. This material will be recycled and sold as scrap to the greatest extent possible. When necessary, excavation will be required for the removal of foundations, piping, and utilities to a depth of two feet. The first part of this phase would be removal of aboveground piping followed by excavation and removal of foundations (with appropriate disposal of

concrete and steel), which would then be followed by excavation and removal of underground piping. Finally, excavated areas would be backfilled. For site restoration to match the current surface coverings, disturbed areas will be restored as gravel areas or seeded with conservation seed mix.

The overall sequence of decommissioning activities is outlined below:

- Disconnecting power and other utilities.
- Removal of hazardous and regulated materials such as fuels, lubricating oils, and process chemicals.
- Dismantling and removal of equipment suitable for sale or reuse.
- Structural demolition to grade elevation.
- Sizing and beneficial use of salvage or scrap materials.
- Remediation of impacted soils and /or groundwater, if any; and,
- Backfill and restoration.
- The access road will be left in place to allow the landowner continued access to this area of the property.

Aboveground components including structures and equipment will be removed during decommissioning. In addition, foundations will be abandoned in place and/or removed to a depth of at least two feet below ground surface (BGS), then backfilled and seeded to match current conditions. Conduit installed between the equipment at greater depths than two feet will be abandoned in place.

The goal of decommissioning is the safe and efficient removal of the storage facility and reclamation of the site to conditions similar to pre-construction characteristics.

The decommissioning process will take approximately four months. This time includes one month for pre-demolition preparation, removal of hazardous and regulated materials, and disconnection of utilities, two months for equipment removal and structural demolition, and half a month for site restoration.

Performance Criteria for Site Restoration

If a decision is made to decommission the Project, either during construction or following commercial operation, restoration of the site will be to a stabilized, vacant condition. Restoration work would be performed with consideration given to and in compliance with the requirements of applicable local zoning and land use regulations. The plan for restoration would require the owner to dismantle equipment related to the Project, remove the equipment from the site, demolish related structures to grade, and return the area to a vacant and vegetated area. Excavated areas would be back filled as necessary.

The following list includes the site restoration performance criteria proposed for Project decommissioning. In the unlikely event that construction on the Project begins but cannot be completed, the same performance criteria would apply:

1. The facility dismantlement or removal would need to proceed in a safe and environmentally sound manner. It is anticipated that a Health and Safety Plan, Hazardous and Regulated Materials Plan and Phase I Environmental Site Assessment (ESA) would be performed in accordance with the current Occupational Safety and Health Administration (OSHA) and ASTM International Standards. Health and Safety Plans define law, regulations, and best practices for working safely. Hazardous and regulated materials surveys are used to identify areas where such materials were used and stored at a site. Phase I ESAs are used in these instances to identify environmental issues in soil, groundwater, or building materials that may need to be investigated further prior to decommissioning and demolition.
2. To the extent economically feasible, material and equipment will be reused, salvaged, or recycled.
3. Interconnection facilities will be removed to the interface with Connecticut Light and Power/Eversource-owned infrastructure.
4. Hazardous and flammable material will be removed and their associated systems decontaminated prior to the commencement of demolition.
5. Superstructures, foundations, and underground utilities will be removed to a depth of two feet. Facility items at depths greater than three feet will be assessed to the extent necessary or abandoned in place.
6. To the extent required by applicable law, any environmental contamination resulting from the Project will be remediated to applicable standards.
7. The site will be regraded and stabilized using conservation seed mix.

Decommissioning activities would occur in accordance with local, state, and federal regulations in place at that time. The closure of environmental permits and licenses associated with the facility's operation will be coordinated with the applicable state and federal agencies. It is also anticipated that local demolition permits will be required from the Town of Willington.