

Decommissioning Plan

KCE Battery Storage Site Description

The Project is a proposed 4.99 MW BESS located at 100 Salmon Brook St, in Granby, Connecticut. The Subject property is a 4.85 acres lot also known as Tax Parcel ID 101263. The Project is located in Use District Zone Business C2 on a vacant parcel (Figure 1 and Figure 2) with an adjacent industrial zone to the south and east. The subject property is located within a rural industrial portion of town west of Salmon Brook and along US Highway 202. Figures 3.1 and 3.2 depict the existing conditions, including neighboring properties and topography. The Project will be centrally located within the Property with access from the north via a deeded right of way from Mill Pond Drive with interconnection to the west with the point of interconnect being direct tap to roadside distribution lines on Salmon Brook St. Exhibit A depicts the civil design and site plan for the Project.

The 4.99 MW/19.96 megawatt- hour (MWh) battery energy storage system will include two Power Electronic inverters with eight Canadian Solar SolBank 3.0 battery containers. Batteries will be connected to inverters via underground conduit.

Current Conditions

The proposed project site is wooded and unused.

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 facility. 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 following components will be subsequently removed; the BESS, inverter and transformer stations, storage Facilities, ancillary electrical equipment, site and internal access areas, foundation pads and footings for equipment, electrical cabling and conduits, perimeter fencing, detention basin, and control house. 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 regulated materials; disconnecting power and other utilities; 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. Typically, the battery units will be shipped to a recycling facility. Other components of the BESS facility with resale value may be sold in

the wholesale market. Components with no wholesale value will be salvaged and sold as scrap for recycling or disposed of at an approved offsite licensed solid waste disposal facility (landfill).

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. The detention basin will be refilled with clean fill, finished with topsoil, and graded to restore preconstruction drainage patterns to the extent possible. For site restoration to match the current surface coverings, disturbed areas will be restored as gravel areas or seeded with conservation seed mix.

Land disturbed by Project facilities will be restored in such a way as to be used in a reasonably similar manner to its original intended use as it existed prior to Project construction.

An external access drive will provide direct access to the BESS facility from a public road. The gravel pad within the facility will provide access to the internal equipment. Decommissioning activities include the removal and stockpiling of aggregate materials onsite for salvage preparation. Any underlying geotextile fabric, where present and as applicable, will also be removed during the decommissioning process. Fabric that is easily separated from the aggregate during excavation will be disposed of in an approved solid waste disposal facility. Fabric that remains with the aggregate will be sorted out at the processing site and properly disposed of. Following removal of aggregate and any geotextile fabric, the disturbed areas will be graded, de-compacted, backfilled with native subsoil and topsoil, as needed, and land use restored as near as practicable to preconstruction conditions.

Key Capture Energy will be the party responsible for the Project decommissioning. The anticipated sequence of decommissioning and removal is described below; however, overlap of activities is expected and will be determined by the chosen decommissioning contractor:

- Reinforce access and internal areas, if needed, and prepare site for component removal
- Install temporary fencing and best management practices to protect sensitive resources and control erosion during decommissioning activities
- De-energize BESS
- Remove integrated battery storage units
- Dismantling and removal of equipment suitable for sale or reuse
- Remove power conversion systems (inverter/transformer stations)
- Remove Ancillary Electrical Equipment
- Structural demolition to grade elevation
- Sizing and beneficial use of salvage or scrap materials
- Remediation of impacted soils; and

- **Backfill and Restoration**

The access road will be left in place to allow the landowner continued access to this area of the property. Public roads damaged or modified during the decommissioning and reclamation process will be repaired upon completion of the decommissioning phase.

The BESS concrete foundations and gravel pad will be removed to a depth of two (2) feet and recycled or properly disposed of. The BESS site will be graded and restored to pre-construction condition, to the extent practicable. The Project's underground electrical collection system assumes it will be placed at a depth of 18 to 48 inches (1.5 feet to 4 feet). The Plan assumes that electrical cabling located below the ground surface at 24 inches or deeper will be abandoned in place. Conduits installed between the equipment at greater depths than two feet will be abandoned in place. Disturbed areas will be restored as gravel areas or seeded with conservation seed mix.

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. Monitoring and site restoration may extend beyond the period mentioned in the plan to ensure successful revegetation and rehabilitation.

The perimeter fence will be completely removed during decommissioning.

Surface Water Drainage and Control

Surface water conditions at the Project site will be reassessed prior to the decommissioning phase. KCE will obtain the required water quality permits, if needed, before the decommissioning of the Project. Construction stormwater permits will also be obtained, and an Erosion Control and Stormwater Management Plan will be prepared describing the protection needed to reflect conditions present at that time. BMPs may include; construction entrances, temporary seeding, permanent seeding, mulching, erosion control matting, silt fence, filter berms, and filter socks.

Restoration and Revegetation

Project sites that have been excavated and backfilled will be graded as previously described to restore land as required by any regulatory and/or landowner commitments. Soils compacted during decommissioning activities will be de-compacted, as necessary, to restore the land to preconstruction land use. Topsoil will be placed on disturbed areas, as needed, and seeded with appropriate vegetation. Work will be completed to comply with the conditions agreed upon by KCE and the Town of Granby, or as directed by other federal, state, and local regulations in effect at the time of decommissioning.

Major Equipment Required for Decommissioning

The activities involved in decommissioning the project include removal of the above and below-ground components of the Project and restoration. Equipment required for the decommissioning activities is

similar to what is needed to construct the BESS facility and may include, but is not limited to: small cranes, low ground pressure (LGP) and standard track mount excavators, backhoes, LGP and standard track bulldozers, LGP and standard off-road end-dump trucks, front-end loaders, water trucks, disc plows and/or tractors, and ancillary equipment. Standard dump trucks may be used to transport material removed from the site to disposal facilities.

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 24" below grade, and return the area to a vacant and vegetated area.

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 removal would 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 two feet will be assessed to the extent necessary or left 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 Granby.