

Decommissioning Plan, Shepaug Solar

Shepaug LLC
2225 River Road, Southbury Connecticut

1. Background

The intent of this Decommissioning Plan (the “Plan”) is to provide the scope of decommissioning work anticipated for the Shepaug Solar Project (“Shepaug LLC”, the “Project”), following the de-energization of the Project. Shepaug LLC is owned by FirstLight DHD DevCo LLC, and is intended to be operated by FirstLight Generation LLC, and is a proposed 2,657.85 KW DC (1,999 KW AC) ground-mounted solar photovoltaic Project located at 2225 River Road in Southbury, Connecticut.

1.1 Project Description

The Project will occupy roughly 11.78 acres (the “Project Site”) on a 122.6-acre parcel owned by FirstLight CT Housatonic LLC, located in Southbury, Connecticut (the “Site”) . The Project will consist primarily of ground-mounted photovoltaic solar panels supported on a fixed-tilt racking system, seven-foot high perimeter fencing to provide a secure enclosed area for the Project, utility poles and pad-mounted electrical equipment, a gravel access drive, and a stormwater management system.

2. Implementation of Decommissioning Plan

The Plan shall be implemented upon the de-energization of the Project, including but not limited to, abandonment, discontinuance of operations at the Project, or expiration of property rights, as defined herein, and issuance of written notice by the Town of Southbury (the “Town”) to the Owner. The time periods stated herein may be extended by mutual consent of the City and the Owner/Operator.

2.1 Abandonment

Abandonment shall be deemed to have occurred if a period of eighteen (18) months has elapsed since the commencement of construction and the Project has not yet been completed and placed into operation, provided that such lack of completion is not due to a casualty event, equipment failure, permitting matter, natural disaster, interconnection with the local utility, upgrade by the utility company, or financial matter that the Owner/Operator is in good faith attempting to remedy.

2.2 Discontinuance of Operations

Discontinuance of operations shall mean a twelve (12) month period during which at least seventy-five percent (75%) of the photovoltaic solar panels are not producing commercially useful electricity and where such inactivity is not the result of a casualty, equipment problem or upgrade, permitting matter, natural disaster, interconnection with the local utility, upgrade by the utility company, financial matter, or other circumstance impeding operations that the Owner is in good faith attempting to remedy.

2.3 Expiration of Property Rights

Expiration of property rights shall mean when the land lease between the Owner and landowner ends.

3. Decommissioning Activities and Schedule

3.1 Decommissioning Activities

Decommissioning activities will include the removal of all Project components and the restoration of the Project Site as close to its pre-construction condition as possible. Decommissioning will begin with the de-energization of the Project, followed by the removal of major components such as photovoltaic modules, racking systems, steel foundation posts, concrete pads, conduit and conductors, inverters, and

transformers. Following equipment removal, the perimeter security fencing will be taken down, and the Site will be graded and revegetated as necessary to restore the Site to pre-construction conditions.

The majority of Project components, including but not limited to, solar panels, steel support structures, electrical equipment, and wiring, and are anticipated to be recycled if feasible. The Owner will have qualified contractor(s) remove and properly dispose of all structures in accordance with best industry practices to maximize recycling and material recovery. All decommissioning activities will be performed in compliance with applicable federal, state, and local regulations. The Owner will be responsible for ensuring that the Project is decommissioned in accordance with this plan and its defined scope.

3.2 Decommissioning Process

The Owner will coordinate with the interconnecting electric utility to determine schedule and procedure for disconnecting infrastructure from the point of interconnection, as well as removal and proper disposal of all utility-owned structures and equipment.

Owner will remove all associated components of the Project in approximately one hundred and twenty (120) days. Recyclable materials will be transported to appropriate recycling facilities to the extent feasible. Any materials that cannot be feasibly recycled will be transported and properly disposed of in accordance with state and federal law.

The decommissioning process is anticipated to consist of five (5) primary steps, as described below. These steps are preliminary and may be adjusted as part of the final Decommissioning Plan:

Step 1: The decommissioning process will require the mobilization of construction equipment, tools, trash containers and material transportation trucks.

Step 2: The decommissioning process will begin with the decommissioning of the photovoltaic array and its associated racking structure. Certified electricians will de-energize the circuits and confirm the array is safe for disassembly. Panels will then be removed and temporarily stored on-Site. Panels will be assessed for potential reuse, recycling, and/or, proper disposal at an approved Project. The steel racking structure will be unbolted and disassembled.

Step 3: The electrical components will then be removed from the Project Site. Certified electricians will de-energize circuits and confirm the components are safe for removal. The equipment will be removed, aggregated on-Site and transported to an appropriate disposal Project. Any concrete at the Project Site will be demolished and hauled to an appropriate concrete disposal site. The electrical conductors/wiring will be removed from any underground conduits.

Step 4: The perimeter security fence will remain in place during the decommissioning process for security and public safety. Once the Project has been decommissioned, the security fence will be removed and components will be transported to an appropriate Project.

Step 5: Restoration of the Project Site will target pre-Project conditions while enhancing the land's long-term ecological function through the continuation of FirstLight's ecovoltaics initiatives. Any excavated areas will be backfilled with local soils to match surrounding topography. Compacted areas will be de-compacted to promote healthy soil structure and support the reestablishment of native vegetation. Following decommissioning, the Site will be reseeded with a native pollinator seed mix consistent with the practices outlined in the Agrivoltaics Farm Plan (Exhibit 2). This approach will maintain the ecological value of the Site beyond the Project's operational life while supporting native pollinators, soil health, and long-term land use.