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## **Exhibit S – Decommissioning Plan**

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# TOBACCO VALLEY SOLAR

## Decommissioning Plan

June 2017

DWW Solar II, LLC

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## 1. Anticipated Life of Solar Field

As the owner of the Tobacco Valley Solar (Project), DWW Solar II, LLC (DWW Solar) is responsible for decommissioning the Project. Commercial-scale solar fields are designed for a minimum expected operational life of 20 years, but may operate for 25 to 30 years or more. As the solar field approaches the end of its operational life, it is expected that technological advances will make more efficient and cost-effective solar arrays that will economically drive the replacement of the existing solar arrays. The decommissioning plan provides financial assurance that there will be sufficient funds available for decommissioning and site restoration when the solar arrays have reached the end of their useful life.

## 2. Estimated Cost of Decommissioning

Obviously, the cost of decommissioning a solar array more than 20 years into the future cannot be known with any precision. However, given the cost of components today, and the salvage value associated with such components today, one can begin to have an educated estimate as to the cost of salvage. For purposes of the Project, this means that the cost of decommissioning the solar arrays will be offset by the salvage value of the solar panels and components. As of the date of this plan, the estimated salvage value is expected to exceed the decommissioning costs, as shown in Table 1, below.

**Table 1. Estimated  
Decommissioning Costs and  
Salvage Values**

Category	Salvage Value	Less Decommissioning Costs	Net Cost/Benefit
Project Management (contractor costs, equipment, etc.)	\$0	\$250,000	(\$250,000)
Site work/Civil (site reclamation)	\$0	\$1,000,000	(\$1,000,000)
Foundations	\$0	\$0 (included in site work estimate)	\$0
Solar Array Components (solar panels, racks, inverters, etc.)	\$3,000,000	\$1,000,000	\$2,000,000
<b>Total</b>			<b>\$750,000</b>

### 3. Ensuring Decommissioning and Site Restoration Funds

The estimated cost of decommissioning and the estimated salvage value as provided above will be updated upon commencement of commercial operations. The total updated estimated cost of decommissioning, if any, shall be funded in equal annual installments over the first ten years of Project operations. On or prior to December 31 of each calendar year beginning with the calendar year in which the project commences commercial operations through and including calendar year 10, an amount based on the estimate provided herein, if any, to be updated upon commencement of commercial operations, shall be reserved for decommissioning and site restoration. Such annual amounts may be in the form of a performance bond, surety bond, letter of credit, parental guaranty or other form of financial assurance acceptable to the Siting Council (the "Financial Assurance"). On or prior to the end of calendar year 15 of the Project's operation, the estimated costs of decommissioning and the estimated salvage value will be reassessed and an amount equal to the balance of such updated estimated cost of decommissioning (minus salvage value) less the amounts reserved, if any, will be reserved for decommissioning and site restoration. The Financial Assurance shall be kept in place until such time as the decommissioning work has been completed, provided, however, to the extent available as liquid funds, the Financial Assurance may be used to offset the costs of the decommissioning.

### 4. Decommissioning Process Description

Decommissioning and restoration activities will adhere to the requirements of appropriate governing authorities, and will be in accordance with applicable federal, state, and local permits. The decommissioning and restoration process comprises removal of above-ground structures; grading, to the extent necessary; restoration of topsoil (if needed) and seeding. The process of removing structures involves evaluating and categorizing all components and materials into categories of recondition and reuse, salvage, recycling and disposal. The Project consists of numerous materials that can be recycled, including steel, aluminum, glass, copper and plastics. In the interest of increased efficiency and minimal transportation impacts, components and material may be stored on-site until the bulk of similar components or materials are ready for transport. The components and material will be transported to the appropriate facilities for reconditioning, salvage, recycling, or disposal. Above-ground structures include the panels, racks, inverters, pads and any interconnection facilities located on the property. The above-ground structures and below-ground structures are collectively referred to herein as the "Project Components."

Temporary erosion and sedimentation control best management practices will be used during the decommissioning phase of the project. Control features will be regularly inspected during the decommissioning phase and removed at the end of the process.

#### **4.1. Project Component Removal**

Control cabinets, electronic components, and internal cables will be removed. The panels, racks and inverters will be lowered to the ground where they may be transported whole for reconditioning and reuse, or disassembled/cut into more easily transportable sections for salvageable, recyclable, or disposable components.

#### **4.2. PV Module Removal**

Solar photovoltaic modules used in the project are manufactured within regulatory requirements for toxicity based on Toxicity Characteristic Leaching Procedure (TCLP). The solar panels are not considered hazardous waste. The panels used in the Project will contain silicon, glass, and aluminum which have value for recycling. Modules will be dismantled and packaged per manufacturer or approved recyclers specifications and shipped to an approved off-site approved recycler.

#### **4.3. Component Pad Removal**

Pads will be excavated to a depth sufficient to remove all anchor bolts, rebar, conduits, cable, and concrete to a depth of 24 inches below grade. The remaining excavation will be filled with clear sub-grade material of quality comparable to the immediate surrounding area. The sub-grade material will be compacted to a density similar to surrounding subgrade material. All unexcavated areas compacted by equipment used in decommissioning shall be de-compacted in a manner to adequately restore the topsoil and sub-grade material to the proper density consistent and compatible with the surrounding area.

#### **4.4. Electric Wire Removal**

Electric wire made from copper or aluminum has value for recycling. DC wiring can be removed manually from the panels to the inverter. Underground wire in the array of the array will be pulled and removed from the ground. Overhead cabling for the interconnection will be removed from poles. All wire will be sent to an approved recycling facility.

#### **4.5. Racking and Fencing removal**

All racking and fencing material will be broken down into manageable units and removed from facility and sent to an approved recycler. All racking posts driven into the ground will be pulled and removed.

#### 4.6. Concrete Slab Removal

Concrete slabs used as equipment pads will be broken and removed to a depth of two feet below grade. Clean concrete will be crushed and disposed of off-site and/or recycled and reused either on or off-site.

#### 4.7. Access Road

During decommissioning, the processed stone access roads will be stripped exposing the geotextile beneath. The geotextile will then be removed and disposed revealing the original soil surface. The compacted soil beneath the road fill may require ripping with a subsoiler plow to loosen it before it can be returned to crop production.

### 5. Site Restoration Process Description

Following decommissioning activities, the sub-grade material and topsoil from affected areas will be de-compacted and restored to a density and depth consistent with the surrounding areas. If the subsequent use for the Project site will involve agriculture, a deep till of the project site will be undertaken. The affected areas will be inspected, thoroughly cleaned, and all construction-related debris removed. Disturbed areas will be reseeded to promote re-vegetation of the area, unless the area is to be immediately redeveloped. In all areas restoration shall include, as reasonably required, leveling, terracing, mulching, and other necessary steps to prevent soil erosion, to ensure establishment of suitable grasses and forbs, and to control noxious weeds and pests.

### 6. Decommissioning Terms

The project shall be decommissioned within 180 days of the end of the project's operational life. Areas disturbed during the decommissioning phase will be seeded with a drought-tolerant grass seed mix appropriate for the area, unless such areas are being immediately redeveloped for other uses. The gravel access road will remain intact.

## 7. Emergency Response

DWW Solar and the O&M services provider will coordinate with the Town of Simsbury police and volunteer fire departments regarding access to the facility and emergency shutoff switches. Annual emergency response training will be conducted with the Town of Simsbury emergency service providers. Table 3 provides an emergency contact list for the Town of Simsbury.

Each of the entrance gates will have a universal key lock (e.g. Knox lock) for emergency responders. Emergency shutoff switches will also be locked with universal locks and be clearly labeled and lit at night. Communication with emergency service providers is available in the area via cell phone coverage.

**Table 3. Town of Simsbury Emergency Contacts**

Emergencies	Dial 911
<b>Simsbury Police Department</b>	Peter N. Ingvertsen, Chief of Police 933 Hopmeadow Street Lower Level Simsbury, CT 06070 Routine phone calls: 860-658-3100 Emergency: 911
<b>Simsbury Fire District</b>	Kevin Kowalski, Deputy Chief Main Fire Station 871 Hopmeadow Street Simsbury, CT 06070 Business Phone: (860) 658-3243 Emergency: 911