

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Chelsea Solar LLC, pursuant to)
30 V.S.A. § 248, for a certificate of public)
good authorizing the installation and)
operation of the “Chelsea Solar Project,” a)
2.0 MW solar electric generation facility)
located off Willow Road in Bennington,)
Vermont)

Docket No. 17-5024-PET

FIRST SUPPLEMENTAL PREFILED DIRECT TESTIMONY
OF BRAD WILSON
ON BEHALF OF PETITIONER

December 5, 2017

EXHIBITS

Exhibit CS-BW-8

Decommissioning Plan

1 **Q1. Please state your name, occupation, and business address.**

2 A1. My name is Brad Wilson. I am a Project Developer at Ecos Energy LLC (“Ecos”). My
3 business address is 222 South 9th Street, Suite 1600, Minneapolis, Minnesota 55402. My e-mail
4 address is brad.wilson@ecosrenewable.com and my phone number is 612-460-8605.

6 **Q2. What is the purpose of your testimony?**

7 A2. This supplemental testimony provides information in response to the Vermont Public
8 Utility Commission’s December 4, 2017 Notice of Complete Petition issued in the above-
9 captioned case. Specifically, this testimony and the attached ***Exhibit CS-BW-8***, which replaces
10 the original Exhibit CS-BW-8 in its entirety, rectify the inconsistencies identified in the Notice of
11 Complete Petition with respect to the Petitioner’s decommissioning plan and Commission Rule
12 5.900.

14 **Q3. Please describe the decommissioning phase of the Project.**

15 A3. Most of the equipment installed for the Project carries a manufacturer warranty of 25 years,
16 however up to 40 years of useful life for the Project equipment is anticipated. At the end of the
17 Project’s useful life, the Project would be decommissioned. Decommissioning involves the
18 removal of Project equipment from the site, restoration of any stockpiled soils, revegetation, and
19 restoration of the Project Site to a natural state. During decommissioning, all above-ground
20 electrical equipment would be removed from the site and taken to the appropriate nearby materials
21 recycling facility. This includes solar modules, racking, foundation posts, combiner boxes, and
22 equipment skids. Most of the Project components can be recycled for their base materials.

1 Underground conduits, wiring, and foundation posts will also be removed. Concrete foundations
2 for the equipment skid would be removed entirely. The gravel access driveway and perimeter
3 security fence will also be removed. Once the Project equipment is removed, any stockpiled soils
4 on the site would be restored. Then, the site would be re-seeded for natural vegetation ground-
5 cover and monitored for invasive species for a period of one year. To provide assurance to the
6 PUC that the decommissioning activities would be performed at the end of the Project's useful
7 life, a decommissioning fund would be established prior to the commencement of Project
8 construction. The decommissioning fund would be an escrow account or letter of credit, funded
9 by the Petitioner, with the PUC named as beneficiary, substantially in the form of **Appendix B**
10 **(Form Escrow Agreement)** or **Appendix C (Form Letter of Credit)** to **Exhibit CS-BW-8**. If the
11 Petitioner fails to execute the decommissioning plan as required, these funds would be released to
12 the PUC for the purpose of covering the cost of the decommissioning activities. However, if the
13 Petitioner does execute the decommissioning plan, as is anticipated, then those funds would be
14 released back to the Petitioner. A decommissioning plan is included as **Exhibit CS-BW-8**. This
15 document was prepared in a format that has been previously approved by the PUC and the
16 Department of Public Service ("DPS") in other solar project dockets. This document provides
17 more detail about the decommissioning process and the decommissioning fund, as well as
18 providing an estimated amount to perform the decommissioning activities. This amount matches
19 the approximate dollar amount-per-MW that has been approved by the PUC and DPS in previous
20 other solar project dockets. I have also reviewed this dollar amount and determined it to be
21 reasonable for the proposed activities. This cost estimate is slightly higher than the estimate
22 described in the original version of **Exhibit CS-BW-8** due to the inclusion of access road

1 decommissioning costs. My contact information is provided in the answer to question 1 above
2 and my qualifications are set forth in *Exhibit CS-BW-1* filed in this Docket on November 28,
3 2017.

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5 **Q4. Does this conclude your testimony?**

6 A4. Yes.