APPENDIX E

Decommissioning Plan

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TECHNICAL MEMORANDUM

To: Adam Gracia
Senior Project Manager, Development
Benton Solar, LLC
700 Universe Boulevard
Juno Beach, Florida 33408
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Adam.Gracia@nexteraenergy.com

From: Kely Wabnitz, Principal Project Management Team Lead

Date: August 19, 2024

Re: **Benton Solar, LLC High Voltage Transmission Line Decommissioning Plan**

INTRODUCTION

Benton Solar, LLC (Benton Solar), a wholly owned, indirect subsidiary of NextEra Energy Resources, LLC, is submitting an Application to the Minnesota Public Utilities Commission (Commission) for a Route Permit pursuant to Minnesota Statutes 216E and Minnesota Administrative Rules Chapter 7850. Benton Solar requests a Route Permit to construct and operate a 0.5-mile-long, 115-kilovolt transmission line (Project) in Benton County, Minnesota, to deliver energy from the Benton Solar Project to the electric grid.

This decommissioning plan describes those activities, including restoration, that Benton Solar will complete at the end of the Project's useful life and provides a cost estimate prepared by Westwood Professional Services, Inc., included as Attachment 1. Decommissioning activities include the removal of all Project-related facilities and restoration of disturbed areas to approximate preconstruction conditions. This decommissioning plan applies solely to the Project.

DECOMMISSIONING REQUIREMENTS

Benton Solar will notify Benton County when the Project is discontinued. Benton Solar anticipates completing Project decommissioning in 5 to 9 months depending on seasonality. Additional time will likely be needed for post-decommissioning activities such as restoration and monitoring. Benton Solar will incur costs for removal and disposal of the transmission structures and conductors, as well as for the restoration of disturbed areas following the removal of equipment.

DECOMMISSIONING ACTIVITIES

Decommissioning includes removal of Project-related facilities, as described below. Disposal of structures and/or foundations will meet the provisions of this decommissioning plan. Benton Solar will transport components and material to appropriate reconditioning, salvage, recycling, or disposal facilities in accordance with state and federal law and the Benton County Solid Waste Ordinance. Benton Solar

identified a metal recycling facility (EMR Northern Metal Recycling) in Becker, Minnesota, 45.0 miles from the Project. Benton Solar may haul recycling materials to this facility. If this particular facility is not in operation at the time of decommissioning, Benton Solar expects that another facility will be in operation.

Decommissioning activities include the following:

- **Overhead cables:** Benton Solar will remove cables from poles, strip cables of insulation, and spool cables for recycling.
- **Steel transmission poles:** Benton Solar will remove poles using a crane. Poles then will be disassembled and loaded onto a trailer. The towers and other recyclable parts will be hauled away to a scrap yard for recycling.
- **Concrete pier foundations:** Concrete slabs will be broken up and removed up to a depth of 4.0 feet. Clean concrete will be crushed and disposed of off-site and/or recycled and reused on- or off-site. The cost estimate attached includes the cost to haul material to a concrete recycler or scrap yard. Voids left from the removal of foundations will be backfilled with surrounding subsoil and topsoil and fine graded to provide suitable drainage.
- **Hardware, bracing, and attachments:** Benton Solar will remove transmission pole components, which will be hauled to an approved facility.
- **Access roads:** Temporary gravel access roads will be stripped. Compacted soils may require ripping to loosen before revegetation. Foreign road materials will be removed and reused or disposed of in accordance with local regulations. Access roads will be left in place if the landowner desires, at which time the landowner will have responsibility for the access roads. All remaining access roads will conform to applicable Benton County regulations in effect at the time of decommissioning.

MONITORING

The Project's National Pollutant Discharge Elimination System/State Disposal System Construction Stormwater General Permit, stormwater pollution prevention plan, and/or other applicable permits and approvals may require post-restoration monitoring. If monitoring is required, Benton Solar will contract a third-party environmental monitor to observe earthmoving activities, identify any decommissioning- or restoration-related issues impacting on-site and/or off-site areas, and recommend corrective actions, if any, to prevent/mitigate unanticipated on-site and/or off-site impacts. The environmental monitor will be responsible for communicating any environmental concerns and potential issues to Benton Solar, Benton Solar's contractors, and relevant stakeholders in a timely manner. Benton Solar will use discretion to either implement corrective actions or stop work pending additional coordination.

COST ESTIMATE

The attached estimate includes all costs associated with decommissioning activities. Benton Solar anticipates that some of these costs will be offset by revenue received for the scrap value of steel and aluminum equipment. Benton Solar has not considered resale or reuse of Project facilities in the cost estimate. Therefore, it is a "no resale" estimate. Benton Solar will work with Benton County to identify, agree upon, and provide a means of financial surety (e.g., bond, letter of credit, escrow, or similar instrument) to Benton County.

The current estimated cost of decommissioning the Project is provided in Attachment 1. This estimate was prepared using the best available information from credible industry sources.

Assumptions

Benton Solar established the scope of work and individual tasks for this decommissioning plan using professional experience. The Project was broken into individual tasks that were each estimated separately to include labor requirements, equipment needs, and duration. Production and labor rates were established using professional experience and published standards, including RSMeans.[1] After the estimate was completed, typical industry-standard average markups were applied for contingency, overhead, and fees. Estimating methods and assumptions specific to this estimate are described in Attachment 1.

[1] RSMeans. 2024. RS Means Data from Gordian. Available at: https://rsmeans.com. Accessed May 2024.

ATTACHMENT 1

Decommissioning Cost Estimate, Benton Solar Project – Transmission Line, Benton County, Minnesota (Westwood Professional Services 2024)

Westwood

Decommissioning Cost Estimate

Benton Solar Project – Transmission Line

Benton County, Minnesota

Prepared for:

Benton Solar, LLC
700 Universe Blvd.
Juno Beach, FL 33401

Prepared by:

Westwood Professional Services
12701 Whitewater Drive, Suite 300
Minnetonka, MN 55343
(952) 937-5150

Project Number: 0041811.01

Date: May 31, 2024

Benton Solar Project - Transmission Line

	Quantity	Unit	Unit Cost	Total Cost
Mobilization/Demobilization	1	Lump Sum	$6,000.00	$6,000
Mobilization was estimated to be approximately 15% of total cost of other items.				
Transmission System				
Remove Overhead Cables	2,270	Feet	$7.90	$17,936
Loadout Overhead Cables	18.5	Tons	$37.00	$686
Haul Overhead Cables	18.5	Tons	$4.15	$77
Remove and Load Steel Transmission Poles	6	Each	$865.69	$5,194
Haul Steel Poles to Metal Recycling (Becker, MN)	24	Tons	$4.95	$119
Remove Concrete Pier Foundations	6	Each	$1,597.23	$9,583
Haul Concrete to Concrete Recycler	51	Tons	$24.47	$1,245
Haul Hardware, Bracing, and Attachments to Landfill (Becker, MN)	3	Cubic Yards	$14.25	$47
Dispose of Transmission Pole Components	6	Each	$81.00	$486
Dispose of Concrete Piers	51	Tons	$81.00	$4,122
Topsoil and Revegetation at Removed Poles	6	Each	$29.33	$176
Subtotal Transmission System				**$39,672**
Project Management				
Health and Safety Representative (half-time)	3	Weeks	$1,874.50	$5,624
Superintendent (half-time)	3	Weeks	$1,762.50	$5,288
Field Engineer (half-time)	3	Weeks	$1,634.50	$4,904
Subtotal Project Management				**$15,815**
Standard industry weekly rates from RSMeans.				
Home Office and Project Management	5%			**$2,774.32**
Subtotal Demolition/Removals				**$64,300**
Salvage				
Steel Transmission Poles	24	Tons	$248.34	$5,960
Transmission Lines (Steel)	2.5	Tons	$309.58	$773
Transmission Lines (Aluminum)	32,085	Pounds	$0.74	$23,823
Subtotal Salvage				**$30,600**
Salvage values are a combination of the following factors; current market metal salvage prices, current secondary market for solar panel module recycling, discussions with national companies that specialize in recycling and reselling electrical transformers and inverters, and the assumption that care is taken to prevent any damage or breakage of equipment.				
Total Demolition Minus Salvage				**$33,700**

Notes:

1. Prices used in analysis are estimated based on research of current average costs and salvage values.
2. Prices provided are estimates and may fluctuate over the life of the project.
3. Contractor means and methods may vary and price will be affected by these.