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July 3, 2025

VIA ELECTRONIC FILING
Andrew S. Johnston
Executive Secretary
Maryland Public Service Commission
6 St. Paul St., 16th Floor
Baltimore, Maryland 21202

Re: Case No. 9769 – Updated Site Plans and Decommissioning Plan

Dear Mr. Johnston:

Attached for filing in Case No. 9769 on behalf of Jade Meadow III LLC (the "Applicant"), please find updated site plans (the "Updated Site Plans") as a supplement to the Application for a Certificate of Public Convenience and Necessity filed by the Applicant on December 20, 2024.[1]

Additionally, please find as **Attachment A** an updated decommissioning plan (the "Updated Decommissioning Plan") as a supplement to the Supplemental Direct Testimony of Mr. Michael Svedeman, filed on May 14, 2025.[2] The Updated Decommissioning Plan includes both a clean and redlined version compared to the previously filed decommissioning plan.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

/s/

Maxwell T. Cooke

CC: Parties on service list

[1] Maillog No. 314414.
[2] Maillog No. 318816.

ATTACHMENT A

Decommissioning Plan
Jade Meadow III Solar Project
Garrett County, Maryland

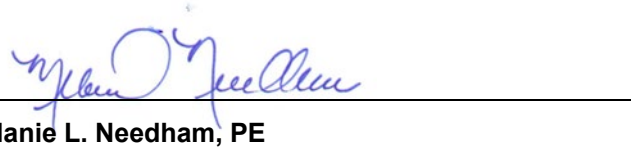
Prepared for:
Jade Meadow III LLC
520 Maryville Centre Drive, Suite 400
St. Louis, MO 63141

Prepared by:
Stantec Consulting Services Inc.
1165 Scheuring Road
De Pere, Wisconsin 54115

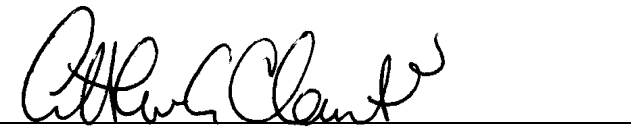
Project No: 193710977
July 2, 2025

This document entitled Decommissioning Plan Jade Meadow III Solar Project, Garrett County, Maryland, was prepared by Stantec Consulting Services Inc. (“Stantec”) for the use of Jade Meadow III LLC and Rev Renewables (the “Client”). The material in this document reflects Stantec’s professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in this document are based on conditions and information existing at the time this document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others.

Matt Knickelbine
Environmental Scientist



Melanie L. Needham, PE
Senior Associate



Matthew A. Clementi, PE
Senior Project Manager/Civil Engineer

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1.0 INTRODUCTION

Jade Meadow III LLC (Jade Meadow III) is proposing to construct the Jade Meadow III Solar Project in Garrett County, Maryland. A small segment of the overhead collector line may be located in Allegany County, Maryland. The proposed Jade Meadow III Solar Project (the Project) is planned to be located northwest of Westernport, Maryland. The Project will occupy up to approximately 1,852 acres of land, the majority of which was previously surface mined for coal. The Project will have a maximum nameplate generating capacity of up to 300 megawatts (MW) alternating current (AC). Major components of the Project include bi-facial solar modules, racking, inverter/transformer stations, access roads, perimeter fencing, substations, switchyard, and electrical collection cabling.

This Decommissioning Plan (Plan) provides a description of the decommissioning and restoration phase of the Project. Start-of-construction is planned for late 2025, with an anticipated Commercial Operation Date as early as December 31, 2027. The decommissioning phase is assumed to include the removal of Project facilities as listed in Section 1.1 and shown in Figure 1.

This Plan includes an overview of the primary decommissioning Project activities: dismantling and removal of facilities, and restoration of land. A summary of estimated costs and revenues associated with decommissioning the Project are included in Section 4.0. The summary statistics and estimates provided are based on a 300-$MW_{[AC]}$ Project array design.

1.1 SOLAR FARM COMPONENTS

The main components of the Project include:

- Solar modules and associated above ground cabling
- Fixed-tilt racking system and steel piles
- Transformers and inverters on concrete pads
- Site access and internal roads
- Below ground electrical cabling and conduits
- Perimeter fencing
- Site access and internal roads
- Two substations
- Overhead electrical collector line
- Permanent utility-owned switchyard

1.2 TRIGGERING EVENTS AND EXPECTED LIFETIME OF PROJECT

Project decommissioning may be triggered by events such as the expiration of lease agreements, abandonment, or when the Project reaches the end of its operational life. Abandonment of a solar facility is typically defined as when a facility ceases to transfer energy on a continuous basis for 12 months. If properly

maintained, the expected lifetime of a utility-scale solar panel is approximately 30 years. Depending on market conditions and Project viability, the solar arrays may be retrofitted with updated components (e.g., panels, frame, racking system, etc.) to extend the life of the Project. In the event that the modules are not retrofitted, or at the end of the Project's useful life, the panels and associated components will be decommissioned and removed from the Project site.

The value of the individual components of the solar facility will vary with time. In general, the highest component value would be expected at the time of construction with declining value over the life of the Project. Over most of the life of the Project, components such as the solar modules could be sold in the wholesale market for reuse or refurbishment. As efficiency and power production of the modules decrease due to aging and/or weathering, the resale value will decline accordingly. Secondary markets for used solar components include other utility scale solar facilities with similar designs that may require replacement equipment due to damage or normal wear over time; or other buyers (e.g., developers, consumers) that are willing to accept a slightly lower power output in return for a significantly lower price point when compared to new equipment.

Components of the solar facility that have resale value may be sold in the wholesale market. Components with no resale value will be salvaged and sold as scrap for recycling or disposed of at an approved offsite licensed solid waste disposal facility (landfill) that complies with state and county regulations. Jade Meadow III will coordinate with the Garrett County Solid Waste and Recycling Division to manage recycling and disposal for the Project. Jade Meadow III will utilize the Garrett County Solid Waste and Recycling facility located at 3118 Oakland Sang Run Road, Oakland, Maryland or similar approved facilities for the recycling and disposal of components. Decommissioning activities will include removal of the arrays and associated components as listed in Section 1.1 and described in Section 2.

1.3 DECOMMISSIONING SEQUENCE

Decommissioning activities will begin within twelve months of the Project ceasing operation and are anticipated to be completed within eighteen months. Monitoring and site restoration may extend beyond this period to ensure successful revegetation and rehabilitation. Prior to decommissioning activities, Jade Meadow III will coordinate with the Garrett County Department of Community Development and Department of Public Works to obtain the required permits to decommission the facility, as necessary. The anticipated sequence of decommissioning and removal is described below; however, overlap of activities is expected.

- Reinforce access roads, if needed, and prepare site for component removal
- Install temporary fencing and erosion control best management practices (BMPs) to protect sensitive resources
- De-energize solar arrays
- Dismantle and remove modules and above ground wiring
- Remove racking equipment and piles
- Remove inverters/transformer station, and concrete pad foundations
- Remove above and below ground electrical cables
- Remove substations
- Remove access and internal gravel roads and grade site
- Grade site and de-compact subsoils as needed and stabilize disturbed land.

2.0 PROJECT COMPONENTS AND DECOMMISSIONING ACTIVITIES

The solar facility components and decommissioning activities necessary to restore the Project area, as near as practicable, to pre-construction conditions, are described within this section.

2.1 OVERVIEW OF SOLAR FACILITY SYSTEM

Jade Meadow III anticipates utilizing approximately 886,366 solar modules, with a total nameplate generating capacity of up to 390 $MW_{[DC]}$ converting to up to 300 $MW_{[AC]}$ on the approximately 1,852-acre site. Statistics and cost estimates provided in this Plan are based on a ZN Shine ZXM6-NHLDD144 440W bifacial module.

Foundations, steel piles, electrical cabling and conduit will be removed up to a depth of six feet during Project decommissioning. Access roads may be left in place if requested and/or agreed to by the landowner; however, for purposes of this assessment, all access roads are assumed to be removed and the land restored. Jade Meadow III will communicate with the appropriate local agency to coordinate the repair of public roads damaged or modified during the decommissioning and reclamation process.

Estimated quantities of materials to be removed and salvaged or disposed of are included in this section. Most of the materials described have salvage value; although, there are some components that will likely have no salvage value at the time of decommissioning. Recyclable materials, salvaged and non-salvageable, will be recycled to the extent possible. Other non-recyclable waste materials will be disposed of in accordance with state and federal law in a licensed solid waste facility.

Table 1 presents a summary of the primary components of the Project included in this decommissioning plan.

Table 1 Primary Components of Solar Farm to be Decommissioned

Component	Quantity	Unit of Measure
Solar Modules; disassembly and removal	886,366	Each
Racking; disassembly and removal	2,592	Each
Steel Piles/ Racking	129,600	Each
Inverter Stations Concrete Pads	115	Each
Transformers and Inverters	115	Each
Below Ground Electrical Cables and Conduits	82,162	Lineal Foot (estimated)
Transmission Line, Overhead	4.5	Mile (estimated)
Perimeter Fencing (wildlife)	190,113	Lineal Foot (estimated)
Internal Access Roads (approximate)	109,726	Lineal Foot (estimated)
Substation Removal	2	Each

2.2 SOLAR MODULES

Jade Meadow III is considering the 440-watt bifacial module manufactured by ZNShine or similar model for the Project. Each module assembly (with frame) has a total weight of approximately 61.73 pounds. The modules are approximately 82.44 inches long and 40.87 inches in width and are mainly comprised of an anodized aluminum frame and various non-metallic materials such as silicon, glass, composite film, plastic, and epoxies.

At the time of decommissioning, module components in working condition may be refurbished and sold in a secondary market, yielding greater revenue than selling as salvage material. The estimates in this report have been calculated using a conservative approach, considering revenue from salvage only, rather than resale of the modules.

2.3 RACKING SYSTEM AND SUPPORT

The solar modules will be mounted on a fixed-tilt, two-in-portrait racking system, such as the MaxSpan manufactured by GameChange Solar. Each racking section is approximately 600 feet in length and will support approximately 342 solar modules. Smaller racking sections may be employed at the edges of the layout, to efficiently utilize available space. The racking system is mainly comprised of galvanized steel and aluminum components; piles that support the system are comprised of galvanized structural steel.

The solar arrays will be deactivated from the surrounding electrical system and made safe for disassembly. Electronic components and internal electrical wiring will be removed and salvaged. The steel piles will be completely removed unless they break during removal. Broken piles will be removed to a depth of at least six feet. The supports, racking system, and piles contain salvageable materials which will be sold to provide revenue to offset decommissioning costs.

2.4 INVERTERS AND TRANSFORMERS

Inverters and transformers will sit on concrete pad foundations at up to 115 locations within the array. The inverters and transformers will be deactivated, disassembled (as needed), and removed. Depending on condition, the equipment may be sold for refurbishment and re-use. If not re-used, they will be salvaged or disposed of at an approved solid waste management facility. Non-hazardous, biobased natural ester oils are generally used in the equipment. All oils, lubricants, and hazardous materials will be collected and disposed of at a licensed facility. In the event of an inadvertent release of oil, typical containment and cleanup methods, such as diversion diking, blocking, sweeping, shoveling and the use of sorbent materials and absorbents, would be employed to control and contain the oil. Project and/or contractor health and safety personnel would oversee the cleanup process and spills would be reported, as required, to the Maryland Department of the Environment or the appropriate agency in place at the time of decommissioning.

2.5 ELECTRICAL CABLING AND CONDUITS

The Project will utilize below ground medium voltage collection line within the solar arrays to bring the converted AC energy from the inverters to the Project's switchyard. The Project's underground electrical

collection and communications system will be installed at depths at least 36 inches below the ground surface. For purposes of this Plan, it is assumed that all cabling and conduit below the surface will be removed, and the ground surface restored. All above ground collection lines and associated components will be removed.

2.6 PROJECT SUBSTATION AND TRANSMISSION LINE

The Project will include two substations, each with a footprint between 1 and 3 acres. The substations will contain within its perimeter, gravel pads, high voltage transformers and footings, electrical control houses and concrete foundations, as needed. An approximately 4.5-mile-long overhead generation tie-in transmission line connects the Project substations to a new utility-owned switchyard.

The substation transformers may be sold for re-use or salvage. Non-hazardous mineral oils are generally used in the equipment. Secondary containment will be used to avoid or minimize any released oils within transformers during decommissioning. Components of the substations that cannot be salvaged will be transported off-site for disposal at an approved waste management facility. All oils, lubricants, and hazardous materials will be collected and disposed of at a licensed facility. Foundations and footings will be demolished and removed. Upon removal of the substations, transmission line and structures, the area will be graded, as needed, and contours restored to a state similar to those prior to the commencement of construction, as practicable. Although the Project substations and transmission line may be retained at the end of the Project's life, an estimated decommissioning cost has been included in this Plan.

2.7 PERIMETER FENCING, SITE ACCESS AND INTERNAL ROADS

The Jade Meadow III site will include a wildlife fence around the perimeter of each array site. Near the end of the decommissioning process, the fence fabric, poles, and foundations will be completely removed from the site.

A network of access roads will allow access to solar facility equipment. The access roads will be composed of gravel approximately 20 feet wide and total approximately 109,726 feet (20.78 miles) in length. The access road lengths may change with the final Project design. Although at the time of decommissioning the property owner may request that some access roads remain, to be conservative, the decommissioning estimate assumes that all Project access roads will be removed.

During installation of the Project, access roads will be excavated to remove topsoil, the subgrade will be compacted, and aggregate fill will be placed as necessary. This plan is based on a design of twelve inches of gravel placed over compacted site soils. The estimated quantities of these materials are provided in Table 2.

Table 2 Typical Access Road Construction Materials

Item	Quantity	Unit
Gravel or granular fill; 12-inch deep	81,279	Cubic Yards

Decommissioning activities include the removal and stockpiling of aggregate materials onsite for salvage preparation. It is conservatively assumed that all aggregate materials will be removed from the Project site and hauled up to five miles from the Project area. Following removal of aggregate, the access road areas will be graded, de-compacted with deep ripper or chisel plow (ripped to 18 inches), backfilled with native subsoil and topsoil, as needed, and land contours restored as near as practicable to preconstruction conditions.

3.0 LAND USE AND ENVIRONMENT

3.1 FORMER LAND USE

The Project area consists primarily of mine reclamation areas, with shallow soils over bedrock. The Maryland Power Plant Research Program (PPRP) has previously indicated that surface mine reclamation sites that are left with very little soil cover as part of the reclamation process are ideal sites for locating solar generation facility projects.

3.2 RESTORATION AND REVEGETATION

Portions of the Project that have been excavated and backfilled will be graded to restore land contours as near as practicable to preconstruction grade. Soils compacted during decommissioning activities will be de-compacted, as necessary, and 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. Restored areas will be revegetated in consultation with the current landowner and in compliance with regulations in place at the time of decommissioning.

3.3 SURFACE WATER DRAINAGE AND CONTROL

As previously described, the proposed Project area is predominantly located on land previously involved in surface coal mining activities. The Project facilities were sited to avoid wetlands and waterways, to the extent possible. The existing Project site conditions and proposed best management practices (BMP) to protect nearby surface water features are described in the Stormwater Management Plan, which is currently being prepared as well as the Soil Erosion and Sediment Control Plan, which will be prepared before the Project construction activities begin.

Surface water conditions at the Project site will be reassessed prior to the decommissioning phase. Jade Meadow III will obtain any required water quality permits from the Maryland Department of the Environment (MDE) and the U.S. Army Corps of Engineers (USACE), if needed, before decommissioning of the Project. Construction stormwater permits will also be obtained, and an erosion control plan will be prepared describing the protection needed to reflect conditions present at the time of decommissioning. BMPs may include: construction entrances, temporary seeding, permanent seeding, mulching (in non-agricultural areas), erosion control matting, silt fence, filter berms, and filter socks.

3.4 MAJOR EQUIPMENT REQUIRED FOR DECOMMISSIONING

The activities involved in decommissioning the Project include removal of all of the above and below ground components of the Project: solar modules, racking systems, foundations and piles, inverters, transformers, access roads, electrical cabling and conduits, substations, and generation tie-in transmission line. Restoration activities include back-filling of pile and foundation sites; de-compaction of subsoils; grading of surfaces; and revegetation per the landowner lease agreement of the disturbed areas.

Equipment required for the decommissioning activities is similar to what is needed to construct the solar facility and may include, but is not limited to: small cranes, low ground pressure (LGP) track mounted excavators, backhoes, LGP track bulldozers and dump trucks, front-end loaders, deep rippers, water trucks, disc plows and tractors to restore subgrade conditions, and ancillary equipment. Standard dump trucks may be used to transport material removed from the site to disposal facilities and to import clean fill and topsoil if necessary.

4.0 DECOMMISSIONING COST ESTIMATE SUMMARY

Expenses associated with decommissioning the Project will be dependent on labor costs at the time of decommissioning. For the purposes of this report 2025 average market values were used to estimate labor expenses. Fluctuation and inflation of the labor costs were not factored into the estimates; however, an inflation factor has been added to the total estimated cost in Table 5. A twenty-five percent contingency cost has also been included for unexpected expenses at the time of decommissioning.

4.1 DECOMMISSIONING EXPENSES

Project decommissioning will incur costs associated with the disposal of components not sold for salvage, including materials that will be disposed of at a licensed facility, as required. Decommissioning costs also include backfilling, grading and restoration of the proposed Project site as described in Sections 2 and 3. Table 3 summarizes the estimated costs for activities associated with the major components of the Project.

Table 3 Estimated Decommissioning Expenses

Activity	Unit	Number	Cost per Unit	Total
Overhead and management (includes estimated permitting required)	Lump Sum	1	1,444,600	$1,444,600
Solar modules; disassembly and removal (increased handling of modules for resale)	Each	886,366	$5.15	$4,564,785
Racking system disassembly and removal	Each	2,592	$1,210	$3,136,320
Steel pile/post removal	Each	129,600	$14.50	$1,879,200
Inverter/transformer stations	Each	115	$94.20	$10,833
Inverter/transformer station concrete pad removal	Each	115	$1,890	$217,350
Remove underground collection and communication cables	Linear Feet	82,162	$0.91	$74,767
Transmission Line, Overhead	Linear Mile	4.5	$275,000	$1,237,500
Perimeter fence removal (wildlife)	Linear Feet	190,113	$3.10	$589,350
Access road excavation and removal	Lump Sum	1	$243,850	$243,850
Topsoil replacement and rehabilitation of site	Lump Sum	1	$1,502,500	$1,502,500
Substation Removal and Site Grading	Each	2	$495,000	$990,000
Total Estimated Decommissioning Cost				**$15,891,055**
Twenty-five percent (25%) contingency cost				**$3,972,750**
Total Estimated Decommissioning Cost (with contingency)				**$19,863,805**

4.2 POTENTIAL DECOMMISSIONING REVENUES

Revenue from decommissioning the Project will be realized through the sale of the facility components and construction materials. As previously described, the value of the decommissioned components will be

higher in the early stages of the Project and decline over time. Resale of components such as solar modules is expected to be greater than salvage (i.e., scrap) value for at least the first ten years of the Project.

Modules and other solar plan components can be sold within a secondary market or as salvage. A current sampling of used solar panels indicates a wide range of pricing depending on age and condition ($0.10 to $0.30 per watt). Future pricing of solar panels is difficult to predict at this time, due to the relatively young age of the market, changes to solar panel technology, and the ever-increasing product demand. A conservative estimation of the value of solar panels at $0.10 per watt would yield approximately $39,000,000. To preserve the integrity of the modules, higher removal and handling costs would be expected for module resale versus salvage. However, the net revenue due to resale would still be substantially greater than the estimated salvage value.

The market value of steel and other materials fluctuates daily and has varied widely over the past five years. Salvage value estimates were based on an approximate five-year-average price of steel and copper derived from sources including on-line recycling companies and United States Geological Survey (USGS) commodity summaries. The price used to value the steel used in this report is $254 per metric ton; aluminum at $0.40 per pound; silicon at $0.40 per pound and glass at $0.05 per pound.

The main component of the racking system and piles is assumed to be salvageable steel. The main components of the solar modules are glass and silicon with aluminum framing. A 50 percent recovery rate was assumed for aluminum and all panel components, due to the processing required to separate the panel components. Alternative and more efficient methods of recycling solar panels are anticipated before this Project is decommissioned, given the large number of solar facilities that are currently being developed. Table 4 summarizes the potential salvage value for the solar array components and construction materials.

Table 4 Estimated Decommissioning Revenues

Item	Unit of Measurement	Quantity per Unit	Salvage Price per Unit[1]	Total Salvage Price per Item	Number of Items[2]	Total
Modules – Silicon	Pounds per Panel	1.5	$0.40	$0.60	886,366	$531,820
Modules – Aluminum	Pounds per Panel	2.5	$0.40	$1.00	886,366	$886,366
Modules - Glass	Pounds per Panel	23.1	$0.05	$1.155	886,366	$1,023,753
Racking Systems and Posts	Metric tons per $MW_{[DC]}$	32	$254	$8,128	390	$3,169,920
Substation Components (steel and transformers)	Lump Sum	1	$75,000	$75,000	2	$150,000
Total Potential Revenue						$5,761,859

* Revenue based on salvage value only. Revenue from used panels at $0.10 per watt could raise $39,000,000 as resale versus the estimated salvage revenue.

4.3 DECOMMISSIONING COST SUMMARY

Table 5 includes a breakdown of the decommissioning estimate with inflation considered annually for the life of the Project. An inflation factor of 2.0% represents the U.S. Federal Reserve's annual inflation target. Estimates are based on 2025 prices, with no fluctuation of market or labor costs considered.

Table 5 Annual Inflation Factor on Net Decommissioning Estimate

Description	(Cost)/Revenue
Gross Decommissioning Expense (with Contingency)	($19,863,805)
Decommissioning Revenue	$5,761,859
Net Decommissioning Estimate	($14,101,946)
First Anniversary of Project Commissioning (2% Annual Increase)	($14,383,985)
Second Anniversary of Project Commissioning (2% Annual Increase)	($14,671,665)
Third Anniversary of Project Commissioning (2% Annual Increase)	($14,965,098)
Fourth Anniversary of Project Commissioning (2% Annual Increase)	($15,264,400)
Fifth Anniversary of Project Commissioning (2% Annual Increase)	($15,569,688)

Description	(Cost)/Revenue
Tenth Anniversary of Project Commissioning (2% Annual Increase)	($17,190,195)
Twentieth Anniversary of Project Commissioning (2% Annual Increase)	($20,954,750)
Thirtieth Anniversary of Project Commissioning (2% Annual Increase)	($25,543,723)

Table 6 provides a summary of the net estimated cost to decommission the Project, using the information detailed in Sections 4.1 and 4.2 and the inflation factor considered in Table 5.

Table 6 Decommissioning Summary

Item	(Cost)/Revenue
Decommissioning Expenses (excluding inflation)	($19,863,805)
Potential Revenue –salvage value only	$5,761,859
Inflation (five years at 2% annual inflation)	($1,467,742)
Net Decommissioning Estimate	**($15,569,688)**

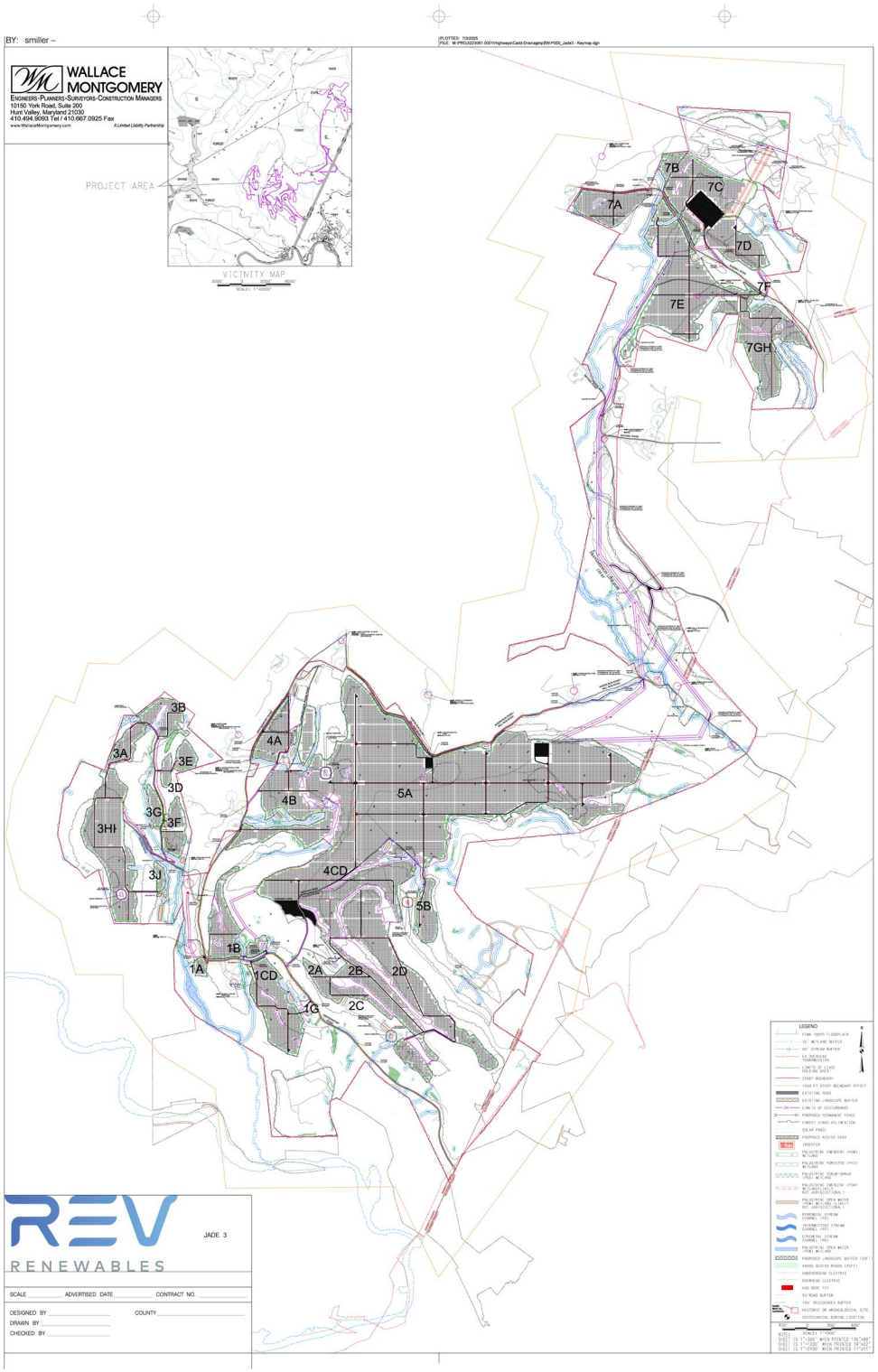
4.4 FINANCIAL ASSURANCE

Jade Meadow III acknowledges that financial assurance is required by Garrett County (County) and the State of Maryland (State) before the commencement of Project construction to cover the net estimated cost to decommission the Project as summarized in Section 4.3. Jade Meadow III proposes to post financial assurance equal to the net decommissioning cost in the amount of **$15,569,688**, which includes a two percent (2%) annual inflation factor for the first five years. Financial assurance will be payable to the County and State. In the event of ownership change, financial assurance will be replaced by the new owner with no gap in coverage.

Jade Meadow III will update the decommissioning plan and submit for Commission approval prior to construction. Jade Meadow III will resubmit an updated decommissioning plan, cost estimate, and financial assurance mechanism on the fifth anniversary after the Commission's pre-construction approval, and every five (5) years thereafter for the life of the Project.

FIGURES

Figure 1 Project Layout



Decommissioning Plan
Jade Meadow III Solar Project
Garrett County, Maryland

Prepared for:
Jade Meadow III LLC
520 Maryville Centre Drive, Suite 400
St. Louis, MO 63141

Prepared by:
Stantec Consulting Services Inc.
1165 Scheuring Road
De Pere, Wisconsin 54115

Project No: 193710977
~~May 13~~July 2, 2025

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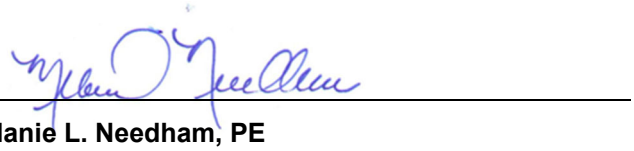
Matt Knickelbine
Environmental Scientist



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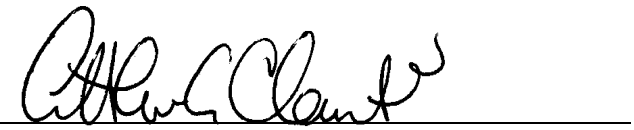

Matthew A. Clementi, PE
Senior Project Manager/Civil Engineer

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- Permanent utility-owned switchyard

1.2 TRIGGERING EVENTS AND EXPECTED LIFETIME OF PROJECT

Project decommissioning may be triggered by events such as the expiration of lease agreements, abandonment, or when the Project reaches the end of its operational life. Abandonment of a solar facility is typically defined as when a facility ceases to transfer energy on a continuous basis for 12 months. If properly

maintained, the expected lifetime of a utility-scale solar panel is approximately 30 years. Depending on market conditions and Project viability, the solar arrays may be retrofitted with updated components (e.g., panels, frame, racking system, etc.) to extend the life of the Project. In the event that the modules are not retrofitted, or at the end of the Project's useful life, the panels and associated components will be decommissioned and removed from the Project site.

The value of the individual components of the solar facility will vary with time. In general, the highest component value would be expected at the time of construction with declining value over the life of the Project. Over most of the life of the Project, components such as the solar modules could be sold in the wholesale market for reuse or refurbishment. As efficiency and power production of the modules decrease due to aging and/or weathering, the resale value will decline accordingly. Secondary markets for used solar components include other utility scale solar facilities with similar designs that may require replacement equipment due to damage or normal wear over time; or other buyers (e.g., developers, consumers) that are willing to accept a slightly lower power output in return for a significantly lower price point when compared to new equipment.

Components of the solar facility that have resale value may be sold in the wholesale market. Components with no resale value will be salvaged and sold as scrap for recycling or disposed of at an approved offsite licensed solid waste disposal facility (landfill) that complies with state and county regulations. Jade Meadow III will coordinate with the Garrett County Solid Waste and Recycling Division to manage recycling and disposal for the Project. Jade Meadow III will utilize the Garrett County Solid Waste and Recycling facility located at 3118 Oakland Sang Run Road, Oakland, Maryland or similar approved facilities for the recycling and disposal of components. Decommissioning activities will include removal of the arrays and associated components as listed in Section 1.1 and described in Section 2.

1.3 DECOMMISSIONING SEQUENCE

Decommissioning activities will begin within twelve months of the Project ceasing operation and are anticipated to be completed within eighteen months. Monitoring and site restoration may extend beyond this period to ensure successful revegetation and rehabilitation. Prior to decommissioning activities, Jade Meadow III will coordinate with the Garrett County Department of Community Development and Department of Public Works to obtain the required permits to decommission the facility, as necessary. The anticipated sequence of decommissioning and removal is described below; however, overlap of activities is expected.

- Reinforce access roads, if needed, and prepare site for component removal
- Install temporary fencing and erosion control best management practices (BMPs) to protect sensitive resources
- De-energize solar arrays
- Dismantle and remove modules and above ground wiring
- Remove racking equipment and piles
- Remove inverters/transformer station, and concrete pad foundations
- Remove above and below ground electrical cables
- Remove substations
- Remove access and internal gravel roads and grade site
- Grade site and de-compact subsoils as needed and stabilize disturbed land.

2.0 PROJECT COMPONENTS AND DECOMMISSIONING ACTIVITIES

The solar facility components and decommissioning activities necessary to restore the Project area, as near as practicable, to pre-construction conditions, are described within this section.

2.1 OVERVIEW OF SOLAR FACILITY SYSTEM

Jade Meadow III anticipates utilizing approximately 886,366 solar modules, with a total nameplate generating capacity of up to 390 $MW_{[DC]}$ converting to up to 300 $MW_{[AC]}$ on the approximately 1,852-acre site. Statistics and cost estimates provided in this Plan are based on a ZN Shine ZXM6-NHLDD144 440W bifacial module.

Foundations, steel piles, electrical cabling and conduit will be removed up to a depth of six feet during Project decommissioning. Access roads may be left in place if requested and/or agreed to by the landowner; however, for purposes of this assessment, all access roads are assumed to be removed and the land restored. Jade Meadow III will communicate with the appropriate local agency to coordinate the repair of public roads damaged or modified during the decommissioning and reclamation process.

Estimated quantities of materials to be removed and salvaged or disposed of are included in this section. Most of the materials described have salvage value; although, there are some components that will likely have no salvage value at the time of decommissioning. Recyclable materials, salvaged and non-salvageable, will be recycled to the extent possible. Other non-recyclable waste materials will be disposed of in accordance with state and federal law in a licensed solid waste facility.

Table 1 presents a summary of the primary components of the Project included in this decommissioning plan.

Table 1 Primary Components of Solar Farm to be Decommissioned

Component	Quantity	Unit of Measure
Solar Modules; disassembly and removal	886,366	Each
Racking; disassembly and removal	2,592	Each
Steel Piles/ Racking	129,600	Each
Inverter Stations Concrete Pads	115	Each
Transformers and Inverters	115	Each
Below Ground Electrical Cables and Conduits	~~58,942~~82,162	Lineal Foot (estimated)
Transmission Line, Overhead	4.5	Mile (estimated)
Perimeter Fencing (wildlife)	~~189,801~~190,113	Lineal Foot (estimated)
Internal Access Roads (approximate)	~~108,819~~109,726	Lineal Foot (estimated)
Substation Removal	2	Each

2.2 SOLAR MODULES

Jade Meadow III is considering the 440-watt bifacial module manufactured by ZNShine or similar model for the Project. Each module assembly (with frame) has a total weight of approximately 61.73 pounds. The modules are approximately 82.44 inches long and 40.87 inches in width and are mainly comprised of an anodized aluminum frame and various non-metallic materials such as silicon, glass, composite film, plastic, and epoxies.

At the time of decommissioning, module components in working condition may be refurbished and sold in a secondary market, yielding greater revenue than selling as salvage material. The estimates in this report have been calculated using a conservative approach, considering revenue from salvage only, rather than resale of the modules.

2.3 RACKING SYSTEM AND SUPPORT

The solar modules will be mounted on a fixed-tilt, two-in-portrait racking system, such as the MaxSpan manufactured by GameChange Solar. Each racking section is approximately 600 feet in length and will support approximately 342 solar modules. Smaller racking sections may be employed at the edges of the layout, to efficiently utilize available space. The racking system is mainly comprised of galvanized steel and aluminum components; piles that support the system are comprised of galvanized structural steel.

The solar arrays will be deactivated from the surrounding electrical system and made safe for disassembly. Electronic components and internal electrical wiring will be removed and salvaged. The steel piles will be completely removed unless they break during removal. Broken piles will be removed to a depth of at least six feet. The supports, racking system, and piles contain salvageable materials which will be sold to provide revenue to offset decommissioning costs.

2.4 INVERTERS AND TRANSFORMERS

Inverters and transformers will sit on concrete pad foundations at up to 115 locations within the array. The inverters and transformers will be deactivated, disassembled (as needed), and removed. Depending on condition, the equipment may be sold for refurbishment and re-use. If not re-used, they will be salvaged or disposed of at an approved solid waste management facility. Non-hazardous, biobased natural ester oils are generally used in the equipment. All oils, lubricants, and hazardous materials will be collected and disposed of at a licensed facility. In the event of an inadvertent release of oil, typical containment and cleanup methods, such as diversion diking, blocking, sweeping, shoveling and the use of sorbent materials and absorbents, would be employed to control and contain the oil. Project and/or contractor health and safety personnel would oversee the cleanup process and spills would be reported, as required, to the Maryland Department of the Environment or the appropriate agency in place at the time of decommissioning.

2.5 ELECTRICAL CABLING AND CONDUITS

The Project will utilize below ground medium voltage collection line within the solar arrays to bring the converted AC energy from the inverters to the Project's switchyard. The Project's underground electrical

collection and communications system will be installed at depths at least 36 inches below the ground surface. For purposes of this Plan, it is assumed that all cabling and conduit below the surface will be removed, and the ground surface restored. All above ground collection lines and associated components will be removed.

2.6 PROJECT SUBSTATION AND TRANSMISSION LINE

The Project will include two substations, each with a footprint between 1 and 3 acres. The substations will contain within its perimeter, gravel pads, high voltage transformers and footings, electrical control houses and concrete foundations, as needed. An approximately 4.5-mile-long overhead generation tie-in transmission line connects the Project substations to a new utility-owned switchyard.

The substation transformers may be sold for re-use or salvage. Non-hazardous mineral oils are generally used in the equipment. Secondary containment will be used to avoid or minimize any released oils within transformers during decommissioning. Components of the substations that cannot be salvaged will be transported off-site for disposal at an approved waste management facility. All oils, lubricants, and hazardous materials will be collected and disposed of at a licensed facility. Foundations and footings will be demolished and removed. Upon removal of the substations, transmission line and structures, the area will be graded, as needed, and contours restored to a state similar to those prior to the commencement of construction, as practicable. Although the Project substations and transmission line may be retained at the end of the Project's life, an estimated decommissioning cost has been included in this Plan.

2.7 PERIMETER FENCING, SITE ACCESS AND INTERNAL ROADS

The Jade Meadow III site will include a wildlife fence around the perimeter of each array site. Near the end of the decommissioning process, the fence fabric, poles, and foundations will be completely removed from the site.

A network of access roads will allow access to solar facility equipment. The access roads will be composed of gravel approximately 20 feet wide and total approximately ~~108,819~~109,726 feet (20.~~61~~78 miles) in length. The access road lengths may change with the final Project design. Although at the time of decommissioning the property owner may request that some access roads remain, to be conservative, the decommissioning estimate assumes that all Project access roads will be removed.

During installation of the Project, access roads will be excavated to remove topsoil, the subgrade will be compacted, and aggregate fill will be placed as necessary. This plan is based on a design of twelve inches of gravel placed over compacted site soils. The estimated quantities of these materials are provided in Table 2.

Table 2 Typical Access Road Construction Materials

Item	Quantity	Unit
Gravel or granular fill; 12-inch deep	~~80,607~~81,279	Cubic Yards

Decommissioning activities include the removal and stockpiling of aggregate materials onsite for salvage preparation. It is conservatively assumed that all aggregate materials will be removed from the Project site and hauled up to five miles from the Project area. Following removal of aggregate, the access road areas will be graded, de-compacted with deep ripper or chisel plow (ripped to 18 inches), backfilled with native subsoil and topsoil, as needed, and land contours restored as near as practicable to preconstruction conditions.

3.0 LAND USE AND ENVIRONMENT

3.1 FORMER LAND USE

The Project area consists primarily of mine reclamation areas, with shallow soils over bedrock. The Maryland Power Plant Research Program (PPRP) has previously indicated that surface mine reclamation sites that are left with very little soil cover as part of the reclamation process are ideal sites for locating solar generation facility projects.

3.2 RESTORATION AND REVEGETATION

Portions of the Project that have been excavated and backfilled will be graded to restore land contours as near as practicable to preconstruction grade. Soils compacted during decommissioning activities will be de-compacted, as necessary, and 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. Restored areas will be revegetated in consultation with the current landowner and in compliance with regulations in place at the time of decommissioning.

3.3 SURFACE WATER DRAINAGE AND CONTROL

As previously described, the proposed Project area is predominantly located on land previously involved in surface coal mining activities. The Project facilities were sited to avoid wetlands and waterways, to the extent possible. The existing Project site conditions and proposed best management practices (BMP) to protect nearby surface water features are described in the Stormwater Management Plan, which is currently being prepared as well as the Soil Erosion and Sediment Control Plan, which will be prepared before the Project construction activities begin.

Surface water conditions at the Project site will be reassessed prior to the decommissioning phase. Jade Meadow III will obtain any required water quality permits from the Maryland Department of the Environment (MDE) and the U.S. Army Corps of Engineers (USACE), if needed, before decommissioning of the Project. Construction stormwater permits will also be obtained, and an erosion control plan will be prepared describing the protection needed to reflect conditions present at the time of decommissioning. BMPs may include: construction entrances, temporary seeding, permanent seeding, mulching (in non-agricultural areas), erosion control matting, silt fence, filter berms, and filter socks.

3.4 MAJOR EQUIPMENT REQUIRED FOR DECOMMISSIONING

The activities involved in decommissioning the Project include removal of all of the above and below ground components of the Project: solar modules, racking systems, foundations and piles, inverters, transformers, access roads, electrical cabling and conduits, substations, and generation tie-in transmission line. Restoration activities include back-filling of pile and foundation sites; de-compaction of subsoils; grading of surfaces; and revegetation per the landowner lease agreement of the disturbed areas.

Equipment required for the decommissioning activities is similar to what is needed to construct the solar facility and may include, but is not limited to: small cranes, low ground pressure (LGP) track mounted excavators, backhoes, LGP track bulldozers and dump trucks, front-end loaders, deep rippers, water trucks, disc plows and tractors to restore subgrade conditions, and ancillary equipment. Standard dump trucks may be used to transport material removed from the site to disposal facilities and to import clean fill and topsoil if necessary.

4.0 DECOMMISSIONING COST ESTIMATE SUMMARY

Expenses associated with decommissioning the Project will be dependent on labor costs at the time of decommissioning. For the purposes of this report 2025 average market values were used to estimate labor expenses. Fluctuation and inflation of the labor costs were not factored into the estimates; however, an inflation factor has been added to the total estimated cost in Table 5. A twenty-five percent contingency cost has also been included for unexpected expenses at the time of decommissioning.

4.1 DECOMMISSIONING EXPENSES

Project decommissioning will incur costs associated with the disposal of components not sold for salvage, including materials that will be disposed of at a licensed facility, as required. Decommissioning costs also include backfilling, grading and restoration of the proposed Project site as described in Sections 2 and 3. Table 3 summarizes the estimated costs for activities associated with the major components of the Project.

Table 3 Estimated Decommissioning Expenses

Activity	Unit	Number	Cost per Unit	Total
Overhead and management (includes estimated permitting required)	Lump Sum	1	1,~~454,900~~4 44,600	$1,~~454,900~~4 44,600
Solar modules; disassembly and removal (increased handling of modules for resale)	Each	886,366	$5.15	$4,564,785
Racking system disassembly and removal	Each	2,592	$1,210	$3,136,320
Steel pile/post removal	Each	129,600	$14.50	$1,879,200
Inverter/transformer stations	Each	115	$94.20	$10,833
Inverter/transformer station concrete pad removal	Each	115	$1,890	$217,350
Remove underground collection and communication cables	Linear Feet	~~58,942~~82 ,162	$0.91	$~~53,637~~74,7 67
Transmission Line, Overhead	Linear Mile	4.5	$275,000	$1,~~375,000~~2 37,500
Perimeter fence removal (wildlife)	Linear Feet	~~189,801~~1 90,113	$3.10	$~~588,383~~589 ,350
Access road excavation and removal	Lump Sum	1	$~~241,800~~24 3,850	$~~241,800~~243 ,850
Topsoil replacement and rehabilitation of site	Lump Sum	1	$1,~~492,000~~ 502,500	$1,~~492,000~~5 02,500
Substation Removal and Site Grading	Each	2	$495,000	$990,000
Total Estimated Decommissioning Cost				**$~~16,004,208~~ 15,891,055**
Twenty-five percent (25%) contingency cost				**$~~4,001,050~~3, 972,750**
Total Estimated Decommissioning Cost (with contingency)				**$~~20,005,258~~ 19,863,805**

4.2 POTENTIAL DECOMMISSIONING REVENUES

Revenue from decommissioning the Project will be realized through the sale of the facility components and construction materials. As previously described, the value of the decommissioned components will be higher in the early stages of the Project and decline over time. Resale of components such as solar modules is expected to be greater than salvage (i.e., scrap) value for at least the first ten years of the Project.

Modules and other solar plan components can be sold within a secondary market or as salvage. A current sampling of used solar panels indicates a wide range of pricing depending on age and condition ($0.10 to $0.30 per watt). Future pricing of solar panels is difficult to predict at this time, due to the relatively young age of the market, changes to solar panel technology, and the ever-increasing product demand. A conservative estimation of the value of solar panels at $0.10 per watt would yield approximately $39,000,000. To preserve the integrity of the modules, higher removal and handling costs would be expected for module resale versus salvage. However, the net revenue due to resale would still be substantially greater than the estimated salvage value.

The market value of steel and other materials fluctuates daily and has varied widely over the past five years. Salvage value estimates were based on an approximate five-year-average price of steel and copper derived from sources including on-line recycling companies and United States Geological Survey (USGS) commodity summaries. The price used to value the steel used in this report is $254 per metric ton; aluminum at $0.40 per pound; silicon at $0.40 per pound and glass at $0.05 per pound.

The main component of the racking system and piles is assumed to be salvageable steel. The main components of the solar modules are glass and silicon with aluminum framing. A 50 percent recovery rate was assumed for aluminum and all panel components, due to the processing required to separate the panel components. Alternative and more efficient methods of recycling solar panels are anticipated before this Project is decommissioned, given the large number of solar facilities that are currently being developed. Table 4 summarizes the potential salvage value for the solar array components and construction materials.

Table 4 Estimated Decommissioning Revenues

Item	Unit of Measurement	Quantity per Unit	Salvage Price per Unit[1]	Total Salvage Price per Item	Number of Items[2]	Total
Modules – Silicon	Pounds per Panel	1.5	$0.40	$0.60	886,366	$531,820
Modules – Aluminum	Pounds per Panel	2.5	$0.40	$1.00	886,366	$886,366
Modules - Glass	Pounds per Panel	23.1	$0.05	$1.155	886,366	$1,023,753
Racking Systems and Posts	Metric tons per $MW_{[DC]}$	32	$254	$8,128	390	$3,169,920
Substation Components (steel and transformers)	Lump Sum	1	$75,000	$75,000	2	$150,000
Total Potential Revenue						$5,761,859

* Revenue based on salvage value only. Revenue from used panels at $0.10 per watt could raise $39,000,000 as resale versus the estimated salvage revenue.

4.3 DECOMMISSIONING COST SUMMARY

Table 5 includes a breakdown of the decommissioning estimate with inflation considered annually for the life of the Project. An inflation factor of 2.0% represents the U.S. Federal Reserve's annual inflation target. Estimates are based on 2025 prices, with no fluctuation of market or labor costs considered.

Table 5 Annual Inflation Factor on Net Decommissioning Estimate

Description	(Cost)/Revenue
Gross Decommissioning Expense (with Contingency)	($~~20,005,258~~19,863,805)
Decommissioning Revenue	$5,761,859
Net Decommissioning Estimate	($14,~~243,399~~101,946)
First Anniversary of Project Commissioning (2% Annual Increase)	($14,~~528,267~~383,985)
Second Anniversary of Project Commissioning (2% Annual Increase)	($14,~~818,832~~671,665)
Third Anniversary of Project Commissioning (2% Annual Increase)	($~~15,115,209~~14,965,098)
Fourth Anniversary of Project Commissioning (2% Annual Increase)	($15,~~417,513~~264,400)
Fifth Anniversary of Project Commissioning (2% Annual Increase)	($15,~~725,863~~569,688)
Tenth Anniversary of Project Commissioning (2% Annual Increase)	($17,~~447,735~~190,195)
Twentieth Anniversary of Project Commissioning (2% Annual Increase)	($~~21,164,942~~20,954,750)
Thirtieth Anniversary of Project Commissioning (2% Annual Increase)	($25,~~799,946~~543,723)

Table 6 provides a summary of the net estimated cost to decommission the Project, using the information detailed in Sections 4.1 ~~&~~and 4.2 and the inflation factor considered in Table 5.

Table 6 Decommissioning Summary

Item	(Cost)/Revenue
Decommissioning Expenses (excluding inflation)	($~~**20,005,258**~~19,863,805)
Potential Revenue –salvage value only	$5,761,859
Inflation (five years at 2% annual inflation)	($1,~~**482,464**~~467,742)

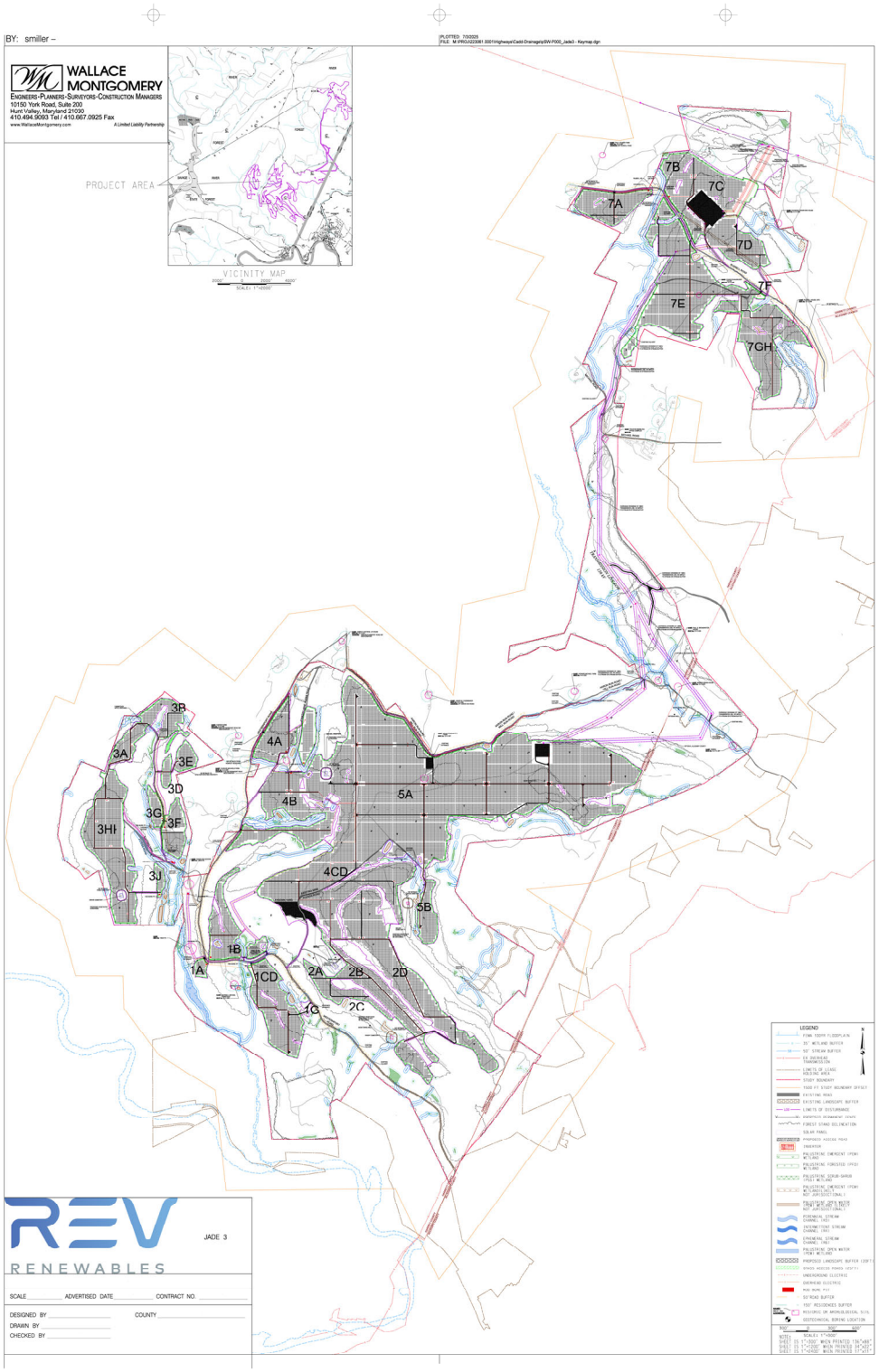
Net Decommissioning Estimate	**($15,~~725,863~~569,688)**

4.4 FINANCIAL ASSURANCE

Jade Meadow III acknowledges that financial assurance is required by Garrett County (County) and the State of Maryland (State) before the commencement of Project construction to cover the net estimated cost to decommission the Project as summarized in Section 4.3. Jade Meadow III proposes to post financial assurance equal to the net decommissioning cost in the amount of **$15,~~725,863~~569,688**, which includes a two percent (2%) annual inflation factor for the first five years. Financial assurance will be payable to the County and State. In the event of ownership change, financial assurance will be replaced by the new owner with no gap in coverage.

Jade Meadow III will update the decommissioning plan and submit for Commission approval prior to construction. Jade Meadow III will resubmit an updated decommissioning plan, cost estimate, and financial assurance mechanism on the fifth anniversary after the Commission's pre-construction approval, and every five (5) years thereafter for the life of the Project.

FIGURES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