

October 9, 2020

Andrew S. Johnston, Executive Secretary
Maryland Public Service Commission
6 Saint Paul Street, 16th Floor
Baltimore, Maryland 21202

Re: Citizens UB Solar, LLC filed, on August 28, 2020, Request for the Approval of Decommissioning Plan Pursuant to PPRP Condition 36; Case No. 9483 (ML# 231642)

Dear Mr. Johnston:

The Power Plant Research Program (PPRP) has reviewed the decommissioning plan and associated cost estimate filed by Citizens UB Solar, LLC on August 28, 2020 in the docket for Case 9483. After a review of the Applicant's plan, PPRP believes that the Applicant's plan is consistent with Condition 36 of the CPCN that was granted by the Commission in this case. We offer the following explanation and comments:

- The Applicant commits to complete removal of all underground facilities, and de-compacting the soil where necessary.
- The plan is clear about the dollar-year used when stating all financial estimates (2020 dollars).
- PPRP notes that, on a per-MW basis, the Citizens UB Solar decommissioning cost estimate is significantly smaller than that for Great Bay Solar I and II (Case 9380). This is largely due to the fact that the Great Bay Solar project includes a dedicated substation that will need to be included in the decommissioning, while Citizens UB Solar does not.
- The cost estimates for both the Great Bay Solar and Citizens UB Solar projects were prepared by the same consultant, Hatch Associates Consultants, Inc. We note that there were some differences between the two cases in terms of the unit costs used to develop the decommissioning cost estimates. In response to PPRP's data request, Citizens UB Solar explained the differences satisfactorily.

- The Applicant's decommissioning plan states on page 1 (Section 1.2) that the facility has an engineered design life of 30 years. However, Hatch's cost estimate states that it is based on a project lifetime of 35 years (Appendix A, page v, Section 3.2). This difference in assumption would not have a significant impact on the decommissioning cost estimate. For future updates of the cost estimate, however, PPRP recommends that the cost estimate be based on the 30-year lifetime that has been referenced throughout the CPCN application review process.

In closing, PPRP would like to note the importance of CPCN Condition 36 and its requirement to update the cost estimate every five years. PPRP anticipates that the market for salvage and recycling of solar photovoltaic panels will evolve over time. This five-year update is important as it is intended to provide a fresh analysis of the market conditions and relevant, available options for future salvage, to include resale of panels and recycling of panel components.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frederick S. Kelley". The signature is fluid and cursive, with the first name "Frederick" being more prominent and the last name "Kelley" following in a similar style.

Frederick S. Kelley
Program Manager, Power Plant Research Program