

**ROUGET ROAD SOLAR
FARM, LLC**

APPENDIX I

**DIRECT
TESTIMONY**

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ROUGET ROAD SOLAR FARM, LLC)
for a Renewable Energy or Storage)
Siting Certificate to construct a solar)
energy facility.)
_____)

Case No. U-22003

DIRECT TESTIMONY

OF

KEVIN COLE

ON BEHALF OF

ROUGET ROAD SOLAR FARM, LLC

APPENDIX I – EXHIBIT 1

September 4, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Kevin Cole, and my business address is 353 N Clark St, 30th Floor, Chicago, IL 60654.

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Rouget Road Solar Farm, LLC (“Rouget” or “the Applicant”) in connection with its application to the Michigan Public Service Commission (“MPSC” or “Commission”) for the Rouget Road Solar Project (the “Project”). Rouget is a wholly owned subsidiary of RWE Clean Energy Development, LLC (“RWE”). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 175 MW of photovoltaic solar panels, to be located within Palmyra township in Lenawee County, Michigan.

Q. Please summarize your professional experience.

A. I have eleven years of practical experience in the renewable energy industry. I have been a Project Development Manager with RWE for three years, focusing on multiple clean energy projects in Michigan, working with civil engineers, surveyors, and sub-consultants in the drafting and design process, and in otherwise obtaining local and state permitting. In my role as Project Development Manager on solar projects, I coordinate with land agents, secure site control, and handle public outreach, among other duties.

Q. Have you previously testified before the Michigan Public Service Commission (“MPSC” or “Commission”) or other governmental agencies?

A. No, I have not previously testified before the Commission or other government agencies.

1 **Q. By whom are you employed and in what position?**

2 A. I am employed by RWE as a project development manager.

3 **Q. What is RWE?**

4 A. RWE is an energy developer, owner, and operator. It employs over 2,000 people
5 throughout North America, including designers, engineers, scientists, and project
6 managers, and is the third largest renewable energy company in the country.

7 RWE's experience includes providing support for renewable power infrastructure,
8 with more than 11 gigawatts of renewable generation projects energized, and 3.9 gigawatts
9 currently under construction.

10 Our project management and engineering staff hold substantial credentials in their
11 respective fields of expertise and regularly provide required reports and studies for
12 governmental permitting of projects at all levels of government. As stated above, part of
13 my principal duties in connection with the Project is coordinating the work of RWE's
14 professionals and experts, their communications with one another and with Rouget, and
15 reviewing the resulting work product for completeness, functionality, and practicality.

16 **Q. Please describe your responsibilities and role at RWE generally.**

17 A. In my role as a Project Development Manager with RWE, I'm responsible for leading
18 utility-scale renewable energy projects from early-stage concept through financial
19 investment decision and handoff to construction. My work spans solar PV, battery energy
20 storage systems, and wind, with a strong focus on delivering bankable, technically sound,
21 and community-supported projects across the Midwest.

1 Day-to-day, I manage all core development disciplines. That includes securing and
2 maintaining site control, negotiating and refining land agreements, working directly with
3 landowners, and guiding engineering teams as we advance project design from preliminary
4 layouts toward Issued for Construction (“IFC”) ready plans. I coordinate closely with
5 environmental, permitting, civil, electrical, interconnection, procurement, and construction
6 teams, both internal subject matter experts and external consultants, to keep the project on
7 schedule and aligned with state, county, and local requirements.

8 A major part of my role involves steering Michigan and Ohio projects through
9 complex permitting pathways, including MPSC state siting applications, local township
10 processes, environmental studies, drainage and stormwater coordination, utility reviews,
11 and required public engagement. I take the lead on preparing and managing RFP responses,
12 state applications, public informational meetings, and the overall development schedule to
13 meet key milestones.

14 On the external side, I also serve as the project’s primary point of contact with
15 township officials, county agencies, environmental partners, engineering firms, emergency
16 services, and community stakeholders. This includes everything from hosting landowner
17 dinners and community outreach events to coordinating safety meetings with fire, EMS,
18 and law enforcement. Internally, I drive project strategy, risk management, cross-
19 functional alignment, and cost optimization, ensuring that every discipline is tracking
20 toward the same commercial and technical targets.

1 In short, my responsibility is to take a large utility-scale project-often hundreds of
2 millions in investment-from a raw idea on a map to a fully permitted, community-
3 supported, utility-ready project that can be handed off confidently to construction.

4 **Q. Have you previously worked with RWE on other projects?**

5 A. Yes. In my three years with RWE, I have served as the Project Development Manager for
6 6 large-scale solar projects and 1 large-scale wind project.

7 **Q. Please describe your responsibilities at RWE in connection with the Project in**
8 **particular.**

9 A. As the Project Development Manager for Rouget Road Solar, I have been responsible for
10 leading all development activities and coordinating the full RWE project team and outside
11 consultants and contractors. My responsibilities further include managing the Project
12 schedule, overseeing engineering and environmental work, and general management
13 duties.

14 I also serve as the primary point of contact for landowners, township officials,
15 county agencies, and emergency services. This includes managing site control, supporting
16 lease extensions and curative work, and organizing community outreach such as landowner
17 meetings and the required public informational meeting.

18 In addition, my role requires that I work closely with our internal SMEs and external
19 consultants to align civil and electrical design, environmental studies, permitting
20 requirements, and project risk management. In short, my role as Project Development
21 Manager for Rouget Road Solar is to keep the Project coordinated, compliant, and
22 progressing toward approval, construction readiness, and long-term success.

1 **Q. Would you please introduce the other witnesses testifying on behalf of Rouget in this**
2 **proceeding and provide an overview of their testimony?**

3 **A.** In addition to my testimony, the following witnesses are providing testimony in support of the
4 Project:

5 (1) **Carol Mcknight**, a Principal Project Manager at SWCA Environmental
6 Consultants, Inc. (“SWCA”), addresses the environmental due diligence and
7 surveys for the Project, the Project’s environmental impacts, certain regulatory
8 outreach, and plans to minimize Project impacts along with related Project details,
9 including cultural impacts, decommissioning, sound, and other items.

10 (2) **Gautam Swamynathan**, a Project Manager at RWE, addresses and describes the
11 construction timeline, permitting items, local job creation, and decommissioning
12 costs.

13 (3) **Blake Holcomb**, a Principal Civil Engineer at SWCA, addresses the Site Plan,
14 public health & safety related to the Project, and dark skies compliance.

15 (4) **Matt Pierce**, an Engineering Director at SWCA, addresses the Stormwater
16 Mitigation Plan and related components.

17 (5) **Ryan Rupprecht**, a Senior Project Manager at SWCA, addresses the
18 decommissioning plans.

19 **II. PURPOSE OF TESTIMONY**

20 **Q. What is the purpose of your direct testimony?**

21 **A.** My testimony summarizes the project development services detailed in multiple portions
22 of the narrative submitted with Rouget’s Application (the “Application”) as well as the

1 exhibits attached thereto. Among other things, I assisted in the preparation of the
2 Application and in the review and acceptance of the exhibits referenced in my testimony.

3 **Q. In connection with the Application, please identify the exhibits you are sponsoring.**

4 A. I am sponsoring, and/or have testimonial purview, as to the following exhibits in **Appendix**
5 **II: Exhibit A-1.5; Exhibit A-2; Exhibit A-4.1; Exhibit A-4.2; Exhibit A-4.3; Exhibit**
6 **A-8.1; Exhibit A-8.2; Exhibit A-8.3; Exhibit A-8.5; Exhibit A-12; and Exhibit A-14.**

7 Other witnesses may also be co-sponsoring or have overlapping testimonial purview as to
8 some or all of the content of the foregoing exhibits as set forth in their respective
9 testimonial submissions.

10 **III. PROJECT OVERVIEW AND SITE PLAN**

11 **Q. Please provide an overview of the Project.**

12 A. The Project will consist of both solar panels and inverters arranged in photovoltaic (PV)
13 arrays, as well as associated facilities and infrastructure. When installed, the Project will
14 have a nameplate capacity of up to 175 MW, with the panels themselves sitting on a fenced-
15 in area of 1,042 acres. The associated facilities and infrastructure include the Project
16 substation, switchyard, operations and maintenance building, overhead transmission line
17 to point-of-interconnection, underground electrical cables to the Project substation,
18 perimeter fencing, temporary and permanent stormwater basins, laydown yards for
19 construction, and access roads to each PV array and the Project substation. A full
20 description of the Project is included within the Application at **Appendix II, Exhibit A-2.**

21 Construction of the Project is expected to begin in 2027, with commercial operation
22 anticipated by June 2029, dependent on receipt of permits, equipment, and approvals.

1 The proposed locations of the solar arrays and other infrastructure are shown in the
2 Site Plan included with the Application at **Appendix II, Exhibit A-1.1**, which exhibit
3 Rouget developed and which I understand to be complete and accurate in its current form.

4 **Q. Please provide a general description of the community where the Project will be**
5 **located.**

6 A. The proposed Project is situated within a predominantly rural and agricultural region of
7 Lenawee County in Palmyra Township, Michigan, approximately 4.5 miles northwest of
8 Blissfield and 6.5 miles southeast of Adrian.

9 Aerial imagery and land use data indicate that the surrounding landscape is
10 characterized by extensive farmland interspersed with woodlots, residential properties, and
11 small commercial structures. The National Land Cover Database identifies the Project Area
12 as being composed of approximately 90% cultivated crops, 6% deciduous forest, 2% low-
13 intensity development, 1% woody wetlands, and less than 1% of other land cover types
14 including developed open space, medium- and high-intensity development, hay/pasture,
15 and emergent herbaceous wetlands.

16 According to the 2020 U.S. Census, Palmyra Township is home to a small, close-
17 knit population. The local economy is largely driven by agriculture, with additional
18 employment in manufacturing, education, health care, and retail services. The nearby
19 communities of Blissfield and Adrian provide additional infrastructure, services, and
20 workforce support for the region. Lenawee County reflects a blend of rural character and
21 small-town amenities, making it a suitable location for renewable energy development.
22 Palmyra Township population: 955 (2020). Land-cover percentages derived from NLCD

2021. These values provide current context for the Project within township and county land use. Refer to **Appendix II, Exhibit A-2** for the Project Description.

Q. What percentage of land within the township is dedicated to energy generation as of the time of the Application?

A. As of September 2026, there are currently no energy facilities sited within Palmyra Township so the percentage of land within the township dedicated to energy generation is 0%. At present, there is no publicly-available data detailing the exact percentage of land in Lenawee County, Michigan, that is dedicated to energy generation, excluding the Rouget Road Solar Farm Project. However, based on known projects and land use estimates, the total area occupied by other energy facilities in the county is relatively small. According to the MPSC GIS hub, there are currently two other utility-scale solar facilities, and one biomass power plant within Lenawee County. There are no wind, natural gas, petroleum, coal, hydroelectric, nuclear, or crude oil facilities within Lenawee County as of September 2026. Lenawee County encompasses approximately 487,040 acres, and aside from the Project leased area, which alone covers about 2,133 acres, other energy projects are estimated to occupy fewer than 1,000 acres combined. This suggests that less than 0.25% of the county's land is currently dedicated to energy generation, not including the Project. Refer to **Appendix II, Exhibit A-2** for the Project Description

IV. ALTERNATIVES AND CHANGES

Q. What criteria were considered in evaluating alternatives to the Project?

A. RWE is the third-largest renewable energy company in the country. With seven projects under development in Michigan, a total of 21 operating facilities in the Midwest, and 12

1 projects currently under construction. With their combined experience and expertise,
2 Rouget and RWE are well-positioned to evaluate potential project sites. I coordinated the
3 preparation of the summary of alternatives included in the Application in **Appendix II,**
4 **Exhibit A-1.5.**

5 Key to the consideration of alternatives were six key factors: strong solar energy
6 potential, proximity of adequate interconnection to the electricity grid, willing landowners,
7 accessible sites, compatible land use, and limited environmental constraints. The Project
8 satisfied the evaluation criteria in a variety of ways, including the availability of sufficient
9 acreage, proximity to a desirable point of interconnection, and the willingness of local
10 landowners to participate in the Project. Within **Exhibit A-1.5**, we additionally detail
11 several internal reconfigurations adopted during the design process, e.g., to avoid or
12 minimize direct environmental or other undesired impacts.

13 **Q. How were potential changes to the project identified and accounted for?**

14 A. The Project team and I coordinated input from RWE and made use of our own prior
15 experience in project development in evaluating anticipated potential changes to the Project
16 as set forth in **Appendix II, Exhibit A-1.6** of the Application. Such potential changes
17 include changes in location to avoid geotechnical complexity, regulated wetlands and other
18 environmentally sensitive areas, changes resulting from applicable setbacks from public
19 roads, and changes driven by non-participating landowners.

20 **V. PROJECT DEVELOPMENT AND COMMUNITY OUTREACH**

21 **Q. Briefly summarize the stakeholder and public outreach conducted for the Project.**

1 A. As summarized in the Application, Rouget has conducted extensive outreach with local
2 residents, state and local elected leaders, government agencies, and the public generally.

3 This engagement includes:

4 (1) **Local Residents:** Rouget has been meeting with prospective landowners and
5 nearby residents since July 2024 to determine local interest in the Project, address
6 local concerns and answer questions about the Project and Rouget, and to secure
7 land rights. Rouget also met with, or attempted to meet with, all non-participating
8 adjacent residences to the Project. Additionally, prior to 2024, the prior Project
9 owner conducted additional local outreach as far back as 2020 when prospective
10 development began.

11 (2) **Local Units of Government:** Rouget has met with representatives from Palmyra
12 Township to advise them of the Project, understand potential concerns, keep them
13 apprised of the development schedule, and discuss community benefit agreements.
14 Rouget has also undertaken outreach to Lenawee County representatives for the
15 same purpose.

16 (3) **Public:** Rouget has also made extensive efforts to share information and gather
17 feedback from members of the community as described in greater detail below and
18 in **Appendix II, Exhibit A-4.2.**

19 **Q. Did Rouget meet with, or offer to meet with, the chief elected official in each affected**
20 **land unit (“ALU”)?**

21 A. Yes. Rouget made a formal offer to meet with the chief elected officials in the affected
22 local units (“ALUs”) to discuss the proposed Project and its implications for the

1 community. The ALUs contacted were Palmyra Township Supervisor, David Pixley, and
2 Lenawee County Chair VanDoren. The meeting invitations were sent in February 2025,
3 was not limited in scope and included opportunities for discussion of community benefits,
4 project timelines, opportunities for collaboration, and anything else of interest to the ALU.
5 **Exhibit A-4.1, Appendix II**, includes copies of the offers to meet with the legislative
6 bodies of the affected ALUs. Both ALUs confirmed in March 2025 that they did not have
7 a Compatible Renewable Energy Ordinance (“CREO”).

8 **Q. Did Rouget conduct meetings with the affected ALUs?**

9 Yes. Following the meeting invitation described above, Rouget on April 14, 2025,
10 conducted a voluntary meeting with Palmyra Township Supervisor, David Pixley, and
11 Township Clerk, Christine Whited, to discuss the site plan, present community benefit
12 agreements for review, and answer any questions. Lenawee County elected officials
13 rejected all invitations to meet.

14 **Q. Describe Rouget’s community outreach efforts in connection with the Project.**

15 A. Rouget has compiled a summary of community outreach efforts regarding the proposed
16 Project in **Appendix II, Exhibit A-4.2**, which includes a detailed summary of the outreach
17 and copies of materials on display. The documentation includes details of all public
18 meetings and presentations conducted as part of the engagement process. This
19 documentation underscores Rouget’s commitment to transparent communication and
20 collaboration with all stakeholders throughout the project development process.

21 **Q. Describe the public meetings.**

1 A. Rouget attended and participated in several town meetings, including special meetings,
2 planning commission meetings, and board meetings (among others). Refer to **Exhibit A-**
3 **4.2** in **Appendix II** for a summary of the meetings, including the dates, attendees, and other
4 applicable information such as meeting minutes and transcripts where available. In addition
5 to an initial public meeting held in 2025 near the project site in Lenawee County, Rouget
6 conducted a follow-up public meeting in Palmyra Township within Lenawee County on
7 August 28, 2026—a summary of same is contained in **Exhibit A-4.2**. The details of the
8 public meeting in the ALUs is as follows:

9 **Date:** August 28, 2026

10 **Time:** 5:30 – 7:30 pm

11 **Location:** Life’s Little Moments Event Center, 6370 Palmyra Road, Palmyra
12 Township, Lenawee County

13 **ALU Attendees:** Mark Crane, Palmyra Township Board Member

14 **Rouget Road Solar Farm, LLC Attendees:** J. Kevin Cole, Mark Quarles, John
15 Weiss, Kaitlyn Elias, Alannah Woodring, Blake Holcomb, Ian Gstalder, Dave
16 O’nofrio, Gillian Kelahan, and Jeremy Jones.

17 **Topics Discussed:**

- 18 • Overview of Project site plan.
19 • Proposed community benefits.

20 **Q. Did Rouget conduct any additional community outreach not already addressed**
21 **above?**

1 A. Yes. In addition to the public meetings and community outreach discussed above, Rouget
2 sponsored the 2025 Lenawee County Fair and attended the small animal auction where
3 Rouget put \$100 “adders” (additional prize money) on animals belonging to local children
4 from around the Project area. This year (2025), Rouget also sponsored the Lenawee County
5 Fair for the first time. Rouget has donated funds to the Fair the last two years. **Exhibits A-**
6 **4.1 and A-4.2, in Appendix II,** contain a detailed summary of community outreach and
7 education efforts, including identifying each participant as well as coordination and shared
8 materials.

9 In addition to the above outreach by the current Project owner, the prior Project
10 owner also conducted additional local outreach beginning in mid-2020, with the first lease
11 agreement executed in June 2020. Outreach and engagement continued thereafter during
12 the development period until RWE assumed ownership of the Project in March 2021.
13 Thereafter, the Project, through RWE, has maintained consistent community outreach and
14 engagement. Beginning in early 2025, the Project also initiated additional targeted outreach
15 to owners of nonparticipating parcels adjoining the Project boundary to further expand
16 robust local project engagement.

17 **Q. Did Rouget make any changes or accommodations to the Project design to address,**
18 **or in response to, public comments and/or feedback?**

19 A. Yes. Based on comments during the public meetings provided by nonparticipating
20 landowners within the Project’s vicinity, the Project incorporated into the design additional
21 landscape screening for nonparticipating landowners within one-quarter mile of the
22 Project. **Appendix II, Exhibit A-1.1** (Sheets LP-001 through LP-006). A copy of the

1 public meeting transcript as well as the public meeting comment cards are attached.

2 **Exhibit A-4.3**, in **Appendix II**, also includes a summary of the accommodations made by
3 Rouget following public comments received.

4 **Q. Did Rouget have a pre-Application meeting with Commission Staff?**

5 A. Yes. Rouget met with Commission Staff on July 16, 2026 for the required pre-Application
6 meeting. Additionally, Rouget has met with Commission Staff on several additional
7 occasions to discuss the Project and the application submission materials.

8 **VI. AGREEMENTS WITH LANDOWNERS AND**
9 **ANTICIPATED COMMUNITY BENEFITS**

10 **Q. Briefly describe Rouget's agreements with participating landowners.**

11 A. Rouget has acquired the rights to develop, construct, and operate an up to 175-MW
12 alternating current solar project within 47 parcels of land. These land rights are granted by
13 Options to Lease, Easement Agreements, Exclusive Options to Purchase, Options for
14 Transmission Line and Access Easements. Payments to landowners can be found at
15 **Appendix II, Exhibit A-8.2-Confidential.**

16 **Q. How will participating landowners to be compensated?**

17 A. Payments will be provided to landowners of participating properties as part of the
18 development of the proposed Project, which will provide the property owners with a stable
19 income stream. The expected payments to participating property owners are structured to
20 reflect fair compensation for the use of their land while enabling them to maintain their
21 agricultural or residential activities alongside the energy facility. This approach ensures
22 that the proposed Project will operate in harmony with the local community while
23 benefiting landowners. The payments not only benefit the individual property owners but

1 also contribute to the overall economic quality of the community by supporting local
2 households and encouraging reinvestment in the area.

3 Participating landowners in the Rouget Project have chosen voluntarily to include
4 their property in the Project through one of the following real estate arrangements:
5 collection line agreements, leases, or purchase option agreements. Each agreement
6 includes varying, confidential economic terms.

7 The most significant long-term payments to participating landowners are the
8 Production Term Payments associated with Easement Agreements. The Rouget Project has
9 solar panels sited within a fenced-in area of approximately 1,042 acres. The annual
10 Production Term Payments to landowners is assessed based on the portion of the Property
11 where solar panels have been sited.

12 **Q. Describe any Host Community Agreements or Community Benefits Agreements**
13 **related to the Project.**

14 A. On July 31, 2025, Rouget sent to the Chief Elected Official of Palmyra Township a Host
15 Community Agreement (“HCA”). Palmyra Township responded on September 11, 2025,
16 requesting changes to the HCA, which Rouget agreed to on September 25, 2025. A copy
17 of the November 12, 2025 signed HCA is included with the application in **Appendix II,**
18 **Exhibit A-8.3.** On June 3, 2026, Rouget also sent a proposed HCA to the Chief Elected
19 Official of Lenawee County. Rouget followed up on several occasions thereafter, but
20 Lenawee County did not respond and has not executed an HCA.

21 Consistent with PA 233, the HCAs include express provisions in the Recitals,
22 which is further affirmed in Section II, that Rouget will pay the contracting ALU \$2,000

1 per megawatt of nameplate capacity located within the ALU to be used as determined by
2 the ALU for police, fire, public safety, or other infrastructure, or for other projects as
3 determined by the ALU. Rouget plans to continue seeking an HCA with Lenawee County,
4 but will enter into a compliant community-benefits agreement if Lenawee County is
5 unwilling to execute an HCA.

6 **Q. Describe any other anticipated benefits to the local community from the Project.**

7 A. In addition to the benefits described above, further anticipated benefits include tax revenue
8 benefits and energy needs contributions.

9 **Tax Revenue Benefits:** A primary benefit of the proposed Project will be the
10 generation of substantial tax revenue, which will be paid to local taxing districts. This
11 revenue is critical for funding essential services and is anticipated to contribute to
12 community schools, public safety, infrastructure maintenance, and community
13 development initiatives. To better understand the economic benefits associated with the
14 Project, Rouget contracted with Magnum Economics (“Magnum”) to conduct an economic
15 and fiscal impacts analysis for the proposed Project. Magnum concluded that if the Project
16 qualifies for and receives a Solar Energy Facility Exemption Certificate (SEFEC),
17 cumulative revenues for local taxing districts would total an estimated \$29.8 million over
18 the Project’s 35-year lifespan. This would represent an increase of roughly \$27.8 million
19 over the estimated \$2.0 million that would be collected in the absence of the Project. The
20 estimated revenues would be paid to Lenawee County (\$8.8 million), Palmyra Township
21 (\$4.1 million), Blissfield Community School District (\$4.3 million), Adrian City School

1 District (\$4.3 million), Lenawee Intermediate School District (\$10.1 million), and the
2 Lenawee Library District (\$1.3 million).

3 If the Project does not qualify for the SEFEC, total revenues are estimated to be
4 approximately \$37.0 million. Magnum's Report is included in **Appendix II, Exhibit A-**
5 **8.1**. See also **Exhibit A-1.3 Socioeconomic and Environmental Justice Assessment**.

6 **Energy, Capacity, Reliability, and Resource Adequacy Needs:** The Project will
7 significantly contribute to Michigan's identified energy, capacity, reliability, and resource
8 adequacy needs. Solar energy generation contributes to the stability and availability of
9 energy resources within the state of Michigan, while promoting energy efficiency and
10 community benefits that are brought upon by solar energy development. Unlike other
11 energy generation facilities, solar energy facilities do not consume fuel and require less
12 land than traditional power plant infrastructure. Michigan has set ambitious renewable
13 energy goals, aiming for 50% renewable energy by 2030 and 60% by 2035. The ultimate
14 goal is to achieve 100% clean energy statewide by 2040. This includes transitioning utility
15 providers to 100% carbon-free energy generation by that year. The design and purpose of
16 this Project aligns with Michigan's energy targets and works towards a more resilient
17 power grid. See **Exhibit A-8.5, Appendix II**.

18 **VII. TRANSMISSION AND INTERCONNECTION AGREEMENTS**

19 **Q. Has Rouget entered into any transmission and/or interconnection agreements in**
20 **connection with the Project?**

21 **A.** Yes. The required information related to power transmission and interconnection,
22 including the facility's queue number for identification within the interconnection queue,

1 is included in the executed generator interconnection agreement provided in **Appendix II,**
2 **Exhibit A-12.** This executed agreement is being provided in lieu of the otherwise
3 referenced studies.

4 **VIII. MINIMUM CONDITIONS AND APPLICATION COMPLETION**

5 **Q. Does the Project satisfy the proposed minimum conditions contained in the MPSC's**
6 **Attachment G?**

7 A. Yes. Rouget, under my supervision and direction, has completed the minimum conditions
8 form, included with the Application as **Appendix II, Exhibit A-14.** This Exhibit adheres
9 to the MPSC Exhibit N template, and describes various commitments, agreements,
10 established processes, and contingencies to be observed by Rouget during the course of the
11 Project.

12 **IX. CONCLUSION**

13 **Q. What are your recommendations to the Commission?**

14 A. I recommend approval of the Application as submitted.

15 **Q. Does this conclude your direct testimony?**

16 A. Yes.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ROUGET ROAD SOLAR FARM, LLC)
for a Renewable Energy or Storage)
Siting Certificate to construct a solar)
energy facility.)
_____)

Case No. U-22003

DIRECT TESTIMONY
OF
CAROL MCKNIGHT
ON BEHALF OF
ROUGET ROAD SOLAR FARM, LLC

APPENDIX I – EXHIBIT 2

September 4, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Carol McKnight, and my primary business address is at SWCA Environmental Consultants' Portland Maine office, 8 Science Park Rd., 2^d Floor, Scarborough, ME 04074.

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Rouget Road Solar Farm, LLC ("Rouget Road" or "Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Rouget Road Solar Farm Project (the "Project"). The Project is a proposed solar energy facility that will include a nameplate capacity of up to 175 Megawatts of photovoltaic solar panels, to be located in Palmyra Township, Lenawee County, Michigan.

Q. Please summarize your educational background.

A. I hold a Masters in Environmental Science from Miami University (Ohio) as well as an undergraduate Bachelor of Arts degree in history, and a minor in biology, from the University of Cincinnati.

Q. Please summarize your professional experience.

A. I have worked as an environmental consultant since 1996 on a wide variety of projects and in a wide variety of capacities including but not limited to research, permitting, project management, and general planning. My work as a consultant has included assisting with large projects for both energy and non-energy clients, though most of my career has been related to power and energy projects. I have shifted within the last several years to focusing on large scale renewable energy projects like the Rouget Road Project now at issue. This has included consulting in support of multiple large-scale solar projects in the Midwest. I

1 joined my current firm, SWCA Environmental Consultants (“SWCA”) in March 2023,
2 where I have focused on working as a project manager coordinating and providing direction
3 on permit requirements, and creating reports for renewable energy projects in particular.
4 Prior to joining SWCA, I most recently worked as a consultant with natural resources and
5 energy consulting firms including GHD and AECOM.

6 **Q. Have you previously testified before the MPSC or other governmental agencies?**

7 A. No. I have facilitated obtaining various permits related to renewable energy projects, but
8 I have not previously testified before the Commission or other agencies.

9 **Q. By whom are you employed and in what position?**

10 A. I am employed by SWCA as a principal project manager.

11 **Q. What is SWCA?**

12 A. SWCA is a nationwide, 100% employee-owned environmental consulting firm that
13 provides a full spectrum of environmental and management consulting services. It has over
14 1,700 employees across more than 45 offices in the United States and Mexico. Its primary
15 services include environmental planning and permitting, cultural resource management,
16 biological and ecological services (e.g. conducting studies on threatened and endangered
17 species, habitat restoration, and ecosystem management), water resources management,
18 and sustainability consulting.

19 SWCA is heavily involved in the renewable energy sector, with recent work on
20 large-scale solar farms focusing on guiding projects through regulatory and environmental
21 compliance processes. The firm routinely handles solar projects that are well over 100
22 megawatts (“MW”) in capacity.

1 SWCA's project management and technical staff hold substantial credentials in
2 their respective fields of expertise and regularly provide required reports and studies for
3 governmental permitting of projects at all levels of government.

4 **Q. Please describe your responsibilities at SWCA generally.**

5 A. As a principal project manager, I serve as the primary point of contact between energy
6 project developers, construction firms, and consultants. I coordinate planning, diligence,
7 and other functions within SWCA as well as obtaining information and materials from
8 external sources. For the current Project, this has included overseeing environmental due
9 diligence, supervising, reviewing, and critiquing layout and site plans as relates in
10 particular to their functionality and compliance with regulatory constraints, reviewing
11 studies and plans prepared by SWCA's internal technical experts, and coordinating or
12 otherwise supporting discussions, notices, and filings with various local, state, and federal
13 agencies.

14 **Q. Please describe your responsibilities at SWCA in connection with the Project in**
15 **particular.**

16 A. Rouget Road's owner, RWE Clean Energy, began development of the Project several years
17 prior to my involvement, with initial planning and site selection already well underway
18 when I first became involved in fall of 2024. My initial role was to review existing reports
19 and determine which, if any, required updating. It also included evaluating the Project's
20 design and the necessary diligence needed to comply with the then-emerging MPSC
21 requirements under Public Act 233 of 2023.

22 Since fall of 2024, my work has included further permitting and environmental
23 diligence and analysis, including but not limited to identifying threatened and endangered

1 species risks, potential cultural resource impacts, and performing similar constraint
2 analysis for the Project. I coordinated the internal team at SWCA to identify subject matter
3 experts as needed to support technical details and planning, to discuss alternatives, and
4 otherwise to assist with project design and constraints to meet the newly established MPSC
5 application instructions and requirements.

6 My responsibilities as of late have included drafting, assembling, and otherwise
7 reviewing key elements of the Rought Road Project Application to the MPSC, and
8 otherwise preparing and supporting permit applications related to the Project. In that role,
9 I have coordinated with the RWE/Rouget Road and other vendor teams, as well as with
10 SWCA's internal technical experts and staff, and I have overseen the overall preparation
11 of the Application, its exhibits, and the development of the Application narratives.

12 I have reviewed the Application narratives and exhibits in full, and they are
13 complete and true to the best of my information and belief.

14 II. PURPOSE OF TESTIMONY

15 **Q. What is the purpose of your direct testimony?**

16 A. The purpose of my testimony is to summarize SWCA's project development services,
17 which are detailed more fully within the portions of the Application narrative and the
18 exhibits attached thereto. I oversaw preparation of the Application generally and consulted
19 with Rouget Road in connection with its review and acceptance of both the narratives and
20 the exhibits referenced in my testimony.

21 **Q. In connection with the Application, please identify the exhibits which you are**
22 **sponsoring.**

1 A. I am sponsoring, and/or have testimonial purview, as to the following exhibits: **A-1.2, A-**
2 **1.3, A-1.6, A-1.7, A-1.9, A-1.10, A-1.14, A-1.15, A-1.16, A-2, A-4.4, A-4.5, A-6.1, A-6.2,**
3 **A-6.4, A-7, A-9, A-10, A-11, A-15, and A-16.**

4 Other witnesses may also be sponsoring or have overlapping testimonial purview
5 as to some or all of the content of the foregoing exhibits as set forth in their respective
6 testimonial submissions.

7 **III. PROJECT AREA AND USES**

8 **Q. Please describe the Project generally.**

9 A. The Rouget Road Solar Farm Project is a proposed 175-megawatt alternating current solar
10 photovoltaic power generating facility, to consist principally of solar panels and inverters
11 arranged in photovoltaic arrays along with associated facilities and infrastructure. The
12 associated facilities and infrastructure will include, among other things, the Project
13 substation, switchyard, operations, and maintenance building, overhead transmission line
14 to point-of-interconnection, underground electric cables to the Project substation,
15 perimeter fencing, stormwater basins, laydown yards for construction, and access roads.

16 The Project is to be located in Palmyra Township, Lenawee County, Michigan, near
17 the City of Adrian. The leased project boundary is approximately 2,133 acres, with Project
18 construction limits of disturbance intended to occur on approximately 1,606 acres of what
19 is currently principally agricultural land. These acres together with a 1,000-foot buffer into
20 adjacent lands shall be referred to in my testimony as the "Project Area." When built, the
21 fenced in-portion of the Project would be approximately 1,042 acres.

22 The Applicant is Rouget Road Solar Farm, LLC, a wholly owned subsidiary of
23 RWE Clean Energy LLC.

1 Along with my team at SWCA and with support from RWE, I prepared and
2 reviewed Exhibit A-2 (Project Description) included within Rouget Road's Application.
3 That exhibit sets forth additional details regarding the proposed Project and site plan and
4 expected land uses within the Project Area.

5 **Q. Please describe land uses near the Project.**

6 A. Land uses within the Project Area are principally agricultural, including corn and soybean
7 cultivation among other uses, with limited road, forest, and wetland uses also present.

8 Based on SWCA's review, there are no designated agricultural district, designated
9 coastal areas, inland waterways, groundwater management zones, or coastal erosion hazard
10 areas within the Project Area, nor did field review show any affected areas that have current
11 recreational uses (other than perhaps private hunting/trail uses). The Project Area further
12 contains no known wild, scenic or recreational river corridors, open spaces, geological,
13 historical, or scenic areas, parks, designated wilderness, forest lands, or scenic vistas. It is
14 further devoid of federal or state designated scenic byways, nature preserves, designated
15 trails or public-access fishing areas, utility uses or infrastructure, and institutional,
16 community, or municipal uses or facilities. The Project Area lacks any major
17 communication infrastructure, other than a single cell tower within the leased boundary.
18 The Project Area includes an existing Conservation Reserve Program easement; as
19 described in the accompanying narrative and in Exhibit A-4.4 (Agency Consultations), the
20 relevant landowner has authorized the Department of Agriculture to release the applicable
21 real property from the easement, and Rouget Road is awaiting processing of its request for
22 same.

1 Along with my team at SWCA and with support from RWE, I prepared and
2 reviewed the maps set forth in Exhibit A-1.2 (Area Land Use) and the connected narratives,
3 which—in tandem—set forth current zoning, municipal zoning, and parcel boundaries, and
4 other information concerning current uses within the Project Area. In addition to
5 information collected through field surveys, these maps are based on information from a
6 variety of sources but principally are based on maps obtained through Esri ArcGIS Online
7 and updated to reflect conditions within several months of the date of the Application.
8 These include, among other things, figures showing flood zones and wellhead protection
9 areas.

10 My SWCA team and I developed Figure 7 within Exhibit A-1.2, reflecting the
11 presence of facilities, structures, and adjacent property features. This information was, in
12 turn, considered and incorporated into our creation of the Sound Report including sound
13 isoline modeling as set forth in Exhibit A-1.7 (Sound Report), which is addressed further
14 later in my testimony. I have reviewed Exhibit A-1.2, A-2, and A-1.7 and each is complete
15 and true to the best of my knowledge and belief.

16 **Q. Please describe SWCA's involvement in preparing the Explanatory Information and**
17 **associated exhibits in the Application.**

18 A. My team and I drafted the narratives and assembled the accompanying appendices for
19 Exhibit A-1.3 (Explanatory Materials). The information is based on our review of Rouget
20 Road's plans and SWCA's ensuing environmental consultation.

21 As described in the accompanying A-1.3 narratives, the Project has been
22 thoughtfully designed to align with and protect the natural environment. The Applicant
23 will implement voluntary 50-foot setbacks around wetlands and streams and has designed

1 the Project to avoid approaches and impacts to the River Raisin (which runs along its
2 border).

3 My team and I further conducted multiple assessments, including through field
4 work and desk study, to assure that the Project design and implementation will comply
5 with state and federal natural resource laws as described within the narrative, and to
6 identify and position the Project to obtain all necessary permits prior to construction and
7 operation. These assessments included, but were not limited to, reviewing the Project Area
8 for jurisdictional floodplains (none are present), and for impacts to regulated wetlands,
9 streams, or county drains. SWCA conducted assessments to evaluate the potential for
10 presence of federal and state-listed threatened and endangered species, including through
11 the use of the US Fish and Wildlife Service Information for Planning and Consultation
12 online tool and the Michigan Natural Features Inventory. While these reviews showed a
13 low potential for threatened or endangered species within area of planned disturbance for
14 construction, SWCA has suggested, and Applicant plans to implement, conservation
15 measures to avoid potential impacts to wildlife.

16 The Explanatory Materials Exhibit (A-1.3) also contains a summary of SWCA's
17 sound impact assessment. In short, the Project is not expected to generate noticeable sound
18 impacts at nearby residences and has been designed to minimize operational noise
19 wherever feasible. Conservative predictive modeling confirms that the Project will meet
20 the 55 dBA Leq (1-hour) standard and should thus comply with both MPSC limits and
21 Palmyra Township's general noise ordinance.

22 The accompanying narrative to Exhibit A-1.3 also details that SWCA conducted a
23 desktop visual assessment using the Bureau of Land Management's Visual Resource

1 Management system to evaluate potential visual impacts. The results of that assessment
2 are included in the appendices to Exhibit A-1.3. The narrative describes Rouget Road's
3 plans, as developed in concert with SWCA, concerning mitigating measures to reduce
4 visual impacts, including the use of anti-glare coating on panels, native pollinator-friendly
5 vegetation for landscape screening, as well as other measures. Significant areas of existing
6 woodlands (approximately 200 acres) within the Project site will be preserved, helping to
7 block views of the Project from certain areas and breaking up expansive views of the
8 modules.

9 SWCA additionally supported the development of review of potential impacts to
10 both traffic and solid waste disposal capacity; accompanying the narratives in Exhibit A-
11 1.3 are appendices including an SWCA-developed Solid Waste Plan and Proposed Haul
12 Route Plan, as well as the Applicant's planned efforts to ensure minimal disruption to the
13 local community in relation to traffic and waste. In connection with general project
14 planning, Applicant conferred with officials at the Lenawee County Road Commission;
15 discussions, which are detailed with Exhibit A-4.4 (Agency Consultations), are ongoing,
16 including concerning the Commission's ultimate input on traffic management plans.

17 SWCA further assisted in drafting the narrative and accompanying appendices
18 describing intended measures to avoid impacts to local drainage (including Rouget Road's
19 planned Minimize Mitigate and Repair ("MMR") Assessment related to drainage) and to
20 neighboring parcels generally. In connection with preparing its MMR Assessment and
21 Stormwater Mitigation Plan (see Exhibit A-6.4), Applicant has further conferred with the
22 Lenawee County Drain Commission ("LCDC"), with future meetings intended as the

1 Project progresses; SWCA added details regarding its conference with the LCDC to the
2 Agency Consultation Summary as well.

3 My team further prepared the Socioeconomic and Environmental Justice
4 Assessment included as an appendix to Exhibit A-1.3, which sets forth the bases for our
5 conclusion that the Project will not significantly or adversely impact socioeconomic
6 conditions in the Project Area or nearby communities, but will instead confer economic
7 benefits on the area. We additionally made use of the Michigan Department of
8 Environment Great Lakes and Energy's EJ screening tool, with the results described in the
9 appendix. Based on that tool and SWCA's review, the Project is not anticipated to create
10 environmental justice-related issues within the Project Site or local communities.

11 As to the narratives and appendices included within Exhibit A-1.3, I was either the
12 principal drafter or reviewed and approved each, and I did so further in consultation with
13 Rouget Road to secure its own approval for inclusion of each such element as part of the
14 Application. The narratives and appendices included with Exhibit A-1.3 set forth
15 reasonable and appropriate mitigation measures for the Project. Additionally, the exhibit
16 and appendices are true and complete to the best of my knowledge and belief.

17 **Q. Please describe your role in the creation of the participating parcel lists included with**
18 **the application.**

19 A. I, with the SWCA team's support and Rouget Road's approval, prepared Exhibit A-1.15
20 (Participating Parcels), which includes lists of both participating and adjacent parcels,
21 setting forth the relevant parcel identification number, owner name, overall parcel acreage,
22 and proposed fenced-in parcel acreage. SWCA generated these lists relying on an Alta
23 survey and public tax records available in July of 2025, and through comparison of project

1 maps through ArcGIS. The information in Exhibit A-1.15 is true and complete to the best
2 of my knowledge and belief.

3 **Q. Please describe plans to protect farmland in the Project Area that are included with**
4 **the Application.**

5 A. In consultation with Rouget Road, SWCA prepared the narratives included within both the
6 Soil Survey Sampling and Analysis Plan (an Appendix to Exhibit A-1.4), and Exhibit A-9
7 (Farmland Protection), the latter of which sets forth Rouget Road's plans for how the
8 facility will avoid unreasonably diminishing farmland, including farmland identified in the
9 Soil Sampling and Analysis Plan.

10 The narratives appropriately describe that 97% of land within the Site Plan
11 Boundary is presently utilized for agricultural row crops. Rouget Road's plans include,
12 among other measures, minimizing grading to prevent unnecessary compaction, and
13 applying pollinator-friendly vegetation mixes to absorb precipitation and confer other
14 benefits.

15 The exhibit describes current farmland uses within the Project Area based on US
16 Department of Agriculture National Agriculture Statistics Service information gathered by
17 SWCA and relates this information—as well as the overall Project Site acreage—to current
18 agricultural profiles within Palmyra Township and Lenawee County.

19 The information within Exhibit A-9 is true and complete the best of my knowledge
20 and belief.

21 **IV. ENVIRONMENTAL COMPLIANCE AND MITIGATION**

22 **Q. Please describe SWCA's role in evaluating soil and economic qualities of the proposed**
23 **Project Area.**

1 A. Based on guidance from MPSC staff, SWCA obtained and reviewed the USDA Web Soil
2 Survey for Lenawee County and the proposed Project Area. Eight total reports—six
3 covering Lenawee County and two focused on the Project Area (with and without the 1,000
4 feet buffer) are included as part of Exhibit A-6.1 (Soil and Economic Survey Report).
5 Consideration of these reports was included in development of the Applicant's Farmland
6 Protection Plan included at Exhibit A-9.

7 **Q. Please describe the environmental compliance report included with the Application.**

8 A. Through both site visits and desktop review (relying on publicly available information from
9 a variety of databases and literature review), SWCA in tandem with Rouget Road
10 developed the Environmental Compliance Report ("ECR") included as an Appendix at
11 Exhibit A-6.2 with the Application.

12 The purpose of the ECR is to summarize environmental diligence generally, but
13 also describe the manner in which the Applicant intends to comply with all state and federal
14 environmental laws, including, but not limited to, the federal Natural Resources and
15 Environmental Protection Act ("NREPA"), as well as Public Act 451 of 1994, and Section
16 1705(2) of the Michigan Environmental Protection Act ("MEPA"), MCL 324.1705(2).

17 The ECR describes the results of SWCA's field and desktop assessments, the
18 necessary permits to be maintained, design measures and mitigation strategies either
19 already implemented or planned to avoid, minimize, and address potential impacts, and
20 SWCA's environmental findings generally. The ECR is consistent with a commitment by
21 the Applicant to maintain compliance with environmental laws, and to assuring that the
22 proposed Project will not commence until such laws are satisfied (whether through permit
23 applications, assessments, correspondence, or other measures).

1 **Q. Can you please summarize the findings of the environmental compliance report as**
2 **generated by SWCA?**

3 A. Yes.

4 Based on project design and mitigation described within the ECR, there are little to
5 no anticipated direct impacts. Planned tree clearing is limited to 7.96 acres, with the cleared
6 trees providing potential summer roosting habitat to bat species during the non-hibernation
7 period. As tree clearing will be completed during the hibernation period, there will be no
8 direct impact to the listed bat species. Additionally, there will be significant forested area
9 preserved within the Project Area; consultation with MDNR is ongoing to confirm that the
10 winter tree clearing best management practice (BMP) will not impact bat species. Filling
11 of one-nonregulated wetland is proposed; consultation with MDNR is ongoing as to
12 whether this filling may require BMP or other consideration for reptile habitats. The
13 Project otherwise maintains a 50-foot setback around jurisdictional streams, wetlands, and
14 county drains (though there is a potential that EGLE permits may be required in connection
15 with boring lines larger than 6 inches in diameter). The ECR concludes that the Project,
16 as designed and with mitigation measures as described, can avoid other direct impacts and
17 will be compliant with state and federal environmental laws and regulations.

18 **Q. Please describe the ECR's findings as to each of the reviewed areas of potential**
19 **environmental impacts.**

20 A. The ECR proceeds to summarize SWCA's work and findings with respect to five over-
21 arching areas: (i) Protected Aquatic Resources, (ii) Protected Species and Habitats, (iii)
22 Cultural Resources, (iv) Protected Lands, and (v) Waste and Pollution Prevention.

1 Focusing first on Protected Aquatic Resources, the ECR correctly describes that
2 SWCA performed on-site wetland and water delineations for the Project at multiple times
3 prior to the Application date, with the results included in Appendix A to Exhibit A-6.2.
4 Water resources such as floodplains, wetlands, and watercourses (streams) within the
5 Project Area were field-identified. (Project design buffers, however, have been
6 implemented based on desktop data, to avoid direct impacts to such regulated resources.)

7 Looking second to Protected Species and Habitats, the ECR accurately summarizes
8 SWCA's review of information gained through the US Fish and Wildlife Service
9 ("USFWS") Information for Planning and Consultation ("IPaC"), with such information
10 being included as an appendix to the report. SWCA additionally consulted the Michigan
11 Natural Features Inventory (MNFI) electronic database, engaged in discussions with
12 MDNR staff (as further detailed in both the ECR and Exhibit 4.4 (Agency Consultations)),
13 and conducted an on-site habitat assessment and desktop review, culminating in the
14 Biological Resource Report. The MNFI results and Resource Report are both included as
15 appendices with the ECR. As noted within the ECR, the results of the habitat assessment—
16 and both USFWS and MDNR recommendations concerning best management practices—
17 have been used in project planning to inform siting and design to reduce potential impacts
18 to threatened species. The Applicant has further committed to implementing species
19 specific best management practices recommended by USFWS and MDNR as the Project
20 progresses. Based on SWCA's review and the planned implementation of the measures
21 described in the ECR, no direct impacts to threatened or endangered species are anticipated
22 as a result of the Project.

1 As to the third category, cultural impacts, the ECR describes SWCA's review of
2 the National Register of Historic Places databases and other resources in seeking to identify
3 whether there are known cultural resources within the Project Area. While desktop review
4 did not reveal any specific such resources, SWCA's Cultural Resources Desktop Review
5 (included as an appendix to The ECR) did identify that one previously recorded
6 archaeological site, 20LE28, is potentially within the Project Site Plan boundary, though
7 the archival information and extent of the site, which consists of an indigenous mound
8 complex, is poorly understood. The ECR details SWCA's consultations with the State
9 Historic Preservation Office (which are also detailed within Exhibit 4.4 (Agency
10 Consultations)). At the SHPO's recommendation, SWCA and the Applicant =conducted
11 a Phase I archaeological survey and undertaking further review to avoid any potential
12 impacts. The Phase I archaeological survey was undertaken in accordance with SHPO
13 standards for such efforts and with input from Federally recognized Tribal Nations. Based
14 on the assessment of the Project Area, SWCA and Applicant are coordinating with SHPO
15 to implement necessary buffers and redesign to avoid adverse impacts as shown in Exhibit
16 A-1.6. To that same end, the Unanticipated Discoveries Plan (Exhibit A-1.14), which
17 SWCA developed in tandem with the Applicant, includes measures to address any human
18 remains or unanticipated cultural resources identified through subsequent surveys or during
19 construction or operation of the Project. As the 20LE28 site involves potential indigenous
20 mound resources, the Applicant and SWCA have further solicited tribal engagement as
21 described further within Exhibit A-4.5 (Tribal Consultation).

22 SWCA's review of the fourth category—Protected Lands—is also delineated
23 within the ECR. According to the Protected areas Database of the United States (PAD-

1 US), no protected areas are located within the Project Area. The ECR also accurately
2 describes the Applicant's commitment to planting a mix of pollinator-friendly and
3 regionally appropriate vegetation within the fenced-in areas of the Project—measures that
4 will preserve the character of the surrounding environment and protect farmland and soil
5 quality.

6 As to the final category—Waste and Pollution Prevention—Applicant with
7 SWCA's assistance has developed a Waste Analysis and Characterization Study which—
8 as noted above—is included with Exhibit A-1.3 (Explanatory Materials). SWCA prepared
9 and Applicant reviewed a Phase I Environmental Assessment to evaluate the potential for
10 environmental risks associated with the Project. The assessment revealed no recognized
11 environmental conditions, controlled recognized environmental conditions, or historical
12 recognized environmental conditions in connection with the Project Area. The ECR
13 addresses additional planning requirements for waste generated during construction and
14 operation, including with respect to oil disposal, spill prevention and control, air quality,
15 and materials management, among others.

16 As stated further within the ECR, the Applicant commits to not commencing
17 commercial operation until the Project has complied with applicable state and federal
18 environmental laws. As also stated in the ECR, the Project optimizes efficient use of land
19 to generate solar power, while avoiding direct and significant impacts to any known natural
20 resources, cultural resources, local communities, and existing land uses.

21 The Applicant has included a list of necessary permits and their current status
22 (Exhibit A-6.3), with sponsoring testimony from Mr. Kevin Cole.

1 I assisted in preparing the ECR and have reviewed it with the Applicant; the ECR
2 and its associated appendices are true and complete to the best of my knowledge and belief.

3 **Q. Please describe the Stormwater Mitigation Plan included with the Application.**

4 A. Under my review and project supervision, SWCA's technical staff (including Matt Pierce,
5 PE, Blake Holcomb, PE, and Ian Gstalder) generated the MMR Plan and the Stormwater
6 Mitigation Plan included with Exhibit A-6.4 (Stormwater Mitigation). The MMR Plan is
7 incorporated into and made a part of the Stormwater Mitigation Plan.

8 I also reviewed and summarized the Applicant's discussions with the Lenawee
9 County Drain Commission (LCDC) within Exhibit A-6.4, and as part of the Agency
10 Consultation Exhibit, A-4.4. As described in both exhibits, representatives from RWE and
11 SWCA met with LCDC staff in June of 2025 to discuss design requirements and
12 stormwater mitigation measures appropriate for the Project. Drainage calculations and
13 preliminary detention storage volume calculations were completed for the Project in
14 accordance with the design consultations earlier held with the LCDC. Based on those
15 calculations, post-development modeling indicates that peak-discharge rates are expected
16 to be lower than pre-development peak discharge rates for storm events evaluated. The
17 Stormwater Mitigation Plan details necessary permits and anticipated timelines for both
18 LCDC and EGLE permitting consistent with Part 91 of NREPA.

19 Consistent with my role as project manager, I reviewed and accepted the design
20 plans and report summaries provided by SWCA technical staff in connection with
21 development of the Stormwater Mitigation Plan. The Plan has been accepted by Applicant,
22 and it is true and complete to the best of my knowledge, information, and belief.

1 **Q. Please describe the Sound Report and Monitoring Protocol included with the**
2 **Application.**

3 A. Under my supervision and with my acceptance and review, SWCA staff prepared the
4 Appendices included with Exhibit A-1.7, Sound Report and Monitoring Protocol.

5 SWCA performed long-term ambient noise monitoring at six representative
6 locations across the Project Area during two periods in spring of 2025. As described within
7 the A-1.7 narratives and accompanying report, the monitoring establishes a base-line for
8 post-construction comparison.

9 As detailed above within the context of Exhibit A-1.3 (Explanatory Materials),
10 initial modeling indicates that the Project noise levels post construction should be safely
11 within the 55 dBA level permitted by the MPSC and local ordinance.

12 SWCA nonetheless, consistent with MPSC requirements, prepared detailed post-
13 construction sound monitoring protocols, which are included at Attachment F of the Noise
14 Technical Report portion of Exhibit A-1.7. This attachment details post-construction
15 testing and corrective or mitigation plan measures that will be implemented in the event
16 that noise levels exceed the 55 dBA level permitted by the MPSC and local ordinances.

17 I have reviewed and accepted the sound report and monitoring protocol materials presented
18 with the Application in Exhibit A-1.7, and they are true and complete to my knowledge
19 and belief.

20 **V. AGENCY AND TRIBAL CONSULTATIONS**

21 **Q. Has the Applicant or its consultants for the Project consulted with governmental**
22 **agencies and tribes?**

1 A. Yes. In conjunction with the Applicant and its other consultants, my team prepared the
2 Summary of Agency Consultations document included with the Application at Exhibit A-
3 4.4. This exhibit summarizes consultations conducted with local, state, and federal
4 agencies (or identifies where consultations were deemed unnecessary), and copies of all
5 such communications (as well as meeting agendas indicating participants, timing, and
6 proposed next steps) are included whenever available. My team also prepared a similar
7 document, Exhibit A-4.5, summarizing tribal engagement by Applicant or its consultants
8 to date.

9 **VI. SAFETY RESPONSE AND PUBLIC HEALTH PLANS**

10 **Q. Please describe the Project's Emergency and Fire Response Plans.**

11 A. In coordination with Applicant and local emergency response providers (including
12 Lenawee County Emergency Management, Palmyra and Madison Fire Departments, and
13 the Lenawee County Sheriff's Office), the SWCA team and I drafted the narratives and
14 accompanying Exhibit A-1.9 Emergency Response Plan and Exhibit A-1.10 Fire Response
15 Plan included with the Application. The Plans reflect the Applicant's planned measures to
16 guide construction and field personnel to mitigate risks and hazards related to a variety of
17 emergency and fire scenarios. (Consultations with emergency response agencies are
18 further detailed with Exhibit A-4.4.)

19 The Emergency Response Plan ("ERP") identifies potential hazards and identifies
20 training plans as well as emergency response measures for identified contingencies. Within
21 the ERP are sets of communication protocols to ensure personnel and community safety,
22 and that appropriate first responders are contacted in an effective and efficient manner.

1 The ERP delineates roles and responsibilities for site personnel and identifies required
2 types of contact information to ensure prompt communication.

3 The Fire Response Plan (“FRP”) similarly details local consultation including the
4 status of ongoing discussions with emergency fire responders. It further sets forth hot work
5 and ignition source controls, combustible material management, and fire risk assessment
6 protocols, as well as contingency procedures, training, and schedules for plan review and
7 updates and construction and operations proceed.

8 Both of the SWCA-drafted emergency and fire response plans have been reviewed
9 and accepted by the Applicant and are true and correct to the best of my knowledge and
10 belief.

11 **Q. Please also describe the Project’s Public Safety and Health Plan.**

12 A. My team and I prepared, with Applicant’s acceptance, the Public Safety and Health Plan
13 included with the Application at Exhibit A-10. As described in the Plan and accompanying
14 narratives, the designed solar facility satisfies MPSC setback requirements, National
15 Electric Code requirements for fencing (which will be a minimum of six feet in height with
16 lockable access points), and the solar array will not exceed 25 feet above ground at full tilt
17 (indeed planned maximum tilt is 14 feet). The Project has also been designed to minimize
18 sound impacts to neighboring properties, and sound modeling consistent with AFIP
19 Attachment D demonstrates that facility operations will not exceed an average hourly
20 sound level of 55 decibels (dB) at the nearest exterior wall of any non-participating
21 residence. The ERP and FRP described above are referenced and incorporated into the
22 Plan as well. The Public Health and Safety Plan is complete and true to be the best of my
23 knowledge and belief.

1 **Q. Please also address the Project's plans to comply with dark sky-friendly lighting**
2 **solutions.**

3 A. The proposed Project will utilize dark sky-friendly lighting technology to minimize upward
4 light scatter and will further limit facility lighting to only the O&M building, substation
5 and switchyard, with motion sensors and timers to further reduce hours of lighting.
6 Fixtures at the operations and maintenance building, substation, and switchyard will further
7 be shielded to minimize duration and intensity, in alignment with the Five Principles of
8 Responsible Outdoor Lighting as recommended by DarkSky International. Applicant will
9 comply with Federal Aviation Administration lighting requirements. My team and I
10 developed the Dark Skies Plan set forth in Exhibit A-11 of the Application. Applicant has
11 accepted the plan, which details mitigation measures for both intended permanent and
12 temporary light sources, and that plan is complete and true to the best of my knowledge
13 and belief.

14 **VII. CHANGES AND UNANTICIPATED DISCOVERIES**

15 **Q. How have potential changes to the Project been identified and accounted for within**
16 **the Application?**

17 A. As discussed previously, RWE's planning for the Rouget Road Project first initiated prior
18 to my joining the Project as a consultant in fall of 2024. Indeed, RWE's planning for this
19 Project had been ongoing for several years before my involvement. Further, RWE, which
20 is one of the largest owners of solar energy production in the world, has well-refined
21 experience in planning projects to avoid undesirable impacts and to make efficient use of
22 land and resources. Because the Project has undergone multiple levels of review and

1 design during its multi-year development, and given RWE's experience, there are very few
2 potential Changes that presently remain under consideration.

3 Together with the Applicant, I prepared the narrative and accompanying materials
4 comprising Exhibit A-1.6 (Changes), which details the potential changes currently under
5 consideration (other than potential changes to roads and collection lines within the current
6 Project Area) for the Project.

7 **Q. Please describe the Project's Unanticipated Discoveries Plan.**

8 A. Following MPSC guidance and industry best practices, SWCA and Applicant developed
9 the Unanticipated Discoveries Plan ("UDP") included with the Application as Exhibit A-
10 1.14. The UDP identifies the procedures that Applicant and its consultants will follow in
11 the event that unanticipated natural resources, human remains, or man-made features are
12 discovered during construction or operation. The UDP is bifurcated into two parts—one
13 focusing on natural resources and one focusing on cultural resources (including among
14 others, historic, and cultural exhibits).

15 The UDP calls for training of construction supervisors and the implementation of
16 compliance monitors and establishes contact lists and implementation responsibilities. It
17 also identifies instances when the Michigan State Historic Preservation Office ("SHPO")
18 should be notified based on a determination of significance, or when local police
19 enforcement should be contacted due to, e.g., the discovery of human remains.

20 The UDP was developed in consultation with SWCA's internal natural resources
21 team and following in-depth environmental and natural resources review. This review
22 included desktop assessments, field investigations, and site layout and impact assessments

1 to identify how to minimize and mitigate impacts to state and federally regulated wetlands,
2 streams, floodplains, parks, local species, and historic and cultural resources.

3 **VIII. COMPLAINT RESOLUTION**

4 **Q. Please describe the Applicant's proposed Complaint Resolution Process.**

5 A. In consultant with Rouget Road and with its approval, SWCA prepared the Complaint
6 Resolution Process included as an Appendix with Exhibit A-1.16 (Complaint Resolution).
7 The Plan sets forth pertinent details for individuals to file complaints, including contact
8 information and website information for the Project. It additionally describes Rouget
9 Road's planned complaint review process, which will include determining if complaints
10 relate to violations of laws or permit conditions, and if notifications are required to the
11 MPSC or other entities resulting from the complaint. The process sets forth timelines (5
12 business days for acknowledgment, with intended resolution within 60 days where
13 possible) and commits Rouget Road to filing logs of complaints and resolution with the
14 MPSC on a quarterly basis. The Plan includes Rouget Road's promulgated complaint form
15 as well.

16 **IX. SIGNAL MITIGATION**

17 **Q. Please describe the Project's Signal Mitigation Plan.**

18 A. My team and I prepared a Signal Mitigation Plan included with the Application at Exhibit
19 A-7. As described in the accompanying narrative and within the Plan itself, the Project is
20 not reasonably expected to produce electromagnetic interference or to disrupt
21 communication systems. The planned inverters for the Project are designed and certified
22 to operate without causing harmful interference. The Plan further describes multiple
23 mitigation measures, such as housing inverters and electrical components in grounded,

1 shielded enclosures, that will be employed to further limit potential for radiated or
2 conducted electromagnetic interference. The facility as a whole has been designed in
3 accordance with or to exceed established industry and federal agency guidelines to avoid
4 interference and is expected to operate in harmony with existing communication and
5 navigation systems. The narrative and accompanying Signal Mitigation Plan are true and
6 complete to the best of my knowledge and belief.

7 **X. OTHER INFORMATION AND APPLICATION CHECKLIST**

8 **Q. Is there any other information requested by the Commission that is not otherwise**
9 **included in the Application and its exhibits?**

10 A. Yes. Refer to **Appendix II, Exhibit A-15**, which contains a change tracker showing the
11 revisions between Rouget's original Application filed in December 2025 and this re-filed
12 Application.

13 **Q. Does the Application include a complete Application Checklist?**

14 A. Yes. My team and I completed a form Application Checklist (Exhibit A-16) consistent
15 with MPSC requirements. The checklist shows that all required application elements are
16 met.

17 **XI. CONCLUSION**

18 **Q. What are your recommendations to the Commission?**

19 A. I recommend approval of the Application as submitted.

20 **Q. Does this conclude your direct testimony?**

21 A. Yes.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ROUGET ROAD SOLAR FARM, LLC)
for a Renewable Energy or Storage)
Siting Certificate to construct a solar)
energy facility.)
_____)

Case No. U-22003

DIRECT TESTIMONY
OF
GAUTAM SWAMYNATHAN
ON BEHALF OF
ROUGET ROAD SOLAR FARM, LLC

APPENDIX I – EXHIBIT 3

September 4, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Gautam Swamynathan. My business address is 353 North Clark Street, Chicago, IL 60654

Q. On whose behalf are you providing this testimony?

A. I am submitting testimony on behalf of Rouget Road Solar Farm, LLC (“Rouget Road Solar Project” or the “Applicant”) in connection with its application to the Michigan Public Service Commission (“MPSC” or “Commission”) for the Rouget Road Solar Farm Project (the “Project”). The Project is a proposed solar energy facility that will include a nameplate capacity of up to 175 Megawatts of photovoltaic solar panels, to be located in Palmyra Township, Lenawee County, Michigan.

Q. By whom are you employed and in what capacity?

A. Since October 2025, I have been employed as a project manager by RWE. In that role, I manage pre-construction activities for solar, wind, and battery energy storage projects throughout the central region of the United States. More specifically, I work with engineering, procurement, and construction contractors and finance teams to price, plan, and finalize project designs to prepare for construction. At RWE, I serve as a subject matter expert on issues including permitting, construction compliance, project schedules, and construction planning and management.

Q. Please summarize your educational background.

A. In 2017, I earned a Bachelor of Science in Chemical Engineering from the Honors College at the University of Pittsburgh. And, in 2027, I expect to obtain my Master of Business

1 Administration from the Booth School of Business at the University of Chicago. I am also
2 certified as a Project Management Professional through the Project Management Institute.

3 **Q. Please summarize your professional experience.**

4 A. I have more than 7 years of experience in planning and executing preconstruction and
5 construction plans for projects analogous to the Project here. Prior to joining RWE, I was
6 employed by NextEra Energy as a Lead Project Manager and a Senior Project Manager for
7 early-stage development of utility scale solar, wind, and battery storage projects planned
8 in Michigan and Illinois. At NextEra, I managed a portfolio of 11 projects with a total
9 power output of 1750 MW. Thereafter, I was employed by Intersect Power, an energy
10 infrastructure developer, as a Manager of Renewables Development. At Intersect Power, I
11 led development teams and managed a portfolio of early-to-mid stage wind and solar
12 projects designed to be co-located with datacenters. More specifically, I created project
13 plans, budgets, project schedules, financial models and compliance reports to ensure that
14 each project to which I was assigned was in regulatory compliance as it progressed from
15 early-stage development through the construction phase. In total, I have led, assisted, or
16 consulted on over 30 projects in the renewable energy space across multiple states
17 including Michigan, Illinois, Indiana, and Texas.

18 **Q. Please summarize the testimony you intend to provide to the Commission.**

19 A. My testimony is intended to explain construction and installation methods, the schedule
20 for the Project, permitting, local job creation, and the decommissioning plan associated
21 with the Project as instructed by the Commission's relevant guidance and consistent with
22 industry best practices.

23 **Q. Please explain the basis for your knowledge regarding the Project.**

1 A. In November 2025, I was staffed on the Project by RWE as a project manager. With respect
2 to the Project, I have worked directly with the Applicant regarding construction and pre-
3 construction related matters. In that capacity, my role has included managing the design of
4 (and the contracting for) the Project in preparation for construction. My responsibilities as
5 pre-construction lead have also included planning for the procurement of relevant permits
6 and analyzing local job creation and labor requirements.

7 **Q. In connection with the Application, please identify the exhibits to which you are**
8 **testifying or that fall under your purview?**

9 A. I am sponsoring and/or have testimonial purview, as to the following exhibits in **Appendix**
10 **II: Exhibit A-1.1** (site plan), **Exhibit A-1.4** (construction information), **Exhibit A-3** (the
11 project schedule), **Exhibit 6.3** (permit list and status), and **Exhibit 8.4** (local job creation).
12 Other witnesses may also co-sponsor or have overlapping testimonial purview as to some
13 or all of the content of the foregoing exhibits as set forth in their testimonial submissions.

14 **II. CONSTRUCTION AND INSTALLATION METHODS**

15 **Q. Can you explain the Project's proposed construction and installation methods?**

16 A. Yes. As I explain in further detail, I am competent to explain the planned construction and
17 installation methods described in my below testimony consistent with the Commission's
18 instructions.

19 **Q. Please describe the Project's soil surveying and testing plans, pursuant to the National**
20 **Resources Environmental Protection Act.**

21 A. The Project will conduct soil surveying and testing, pursuant to the Natural Resources and
22 Environmental Protection Act (NREPA). A soil survey protocol has been developed to
23 compare pre-construction (existing) soil conditions to post-construction restoration

1 conditions. This will ensure that the post-construction restoration soil conditions meets or
2 exceeds that of pre-construction soil quality. **Appendix II Exhibit A-1.4** includes the soil
3 survey protocol plan.

4 The Applicant also commissioned Terracon Consultants to conduct a geotechnical
5 investigation for the Project (see **Appendix II, Exhibit A-1.4**). The geotechnical
6 investigation consisted of 28 soil borings at a depth of 20 feet; 28 cone penetration test
7 (CPT) soundings at a depth of 12 – 20 feet; 15 test pits at a depth of 5 – 8 feet; and two soil
8 borings at a depth of 50 feet within the substation location. These samples underwent
9 various lab testing, including moisture content, unconfined compressive strength, grain
10 size analysis, chemical analysis, thermal resistivity, corrosion, California Bearing Ratio,
11 and index testing. These geotechnical investigations support evaluation of the strength,
12 compressibility, stiffness, and density characteristics of the soil in the Project Area as well
13 as the general suitability of the proposed Project equipment.

14 Disturbed areas will be seeded to stabilize the Project Site after construction is
15 completed. The Project will be considered stabilized when soil disturbance is finished and
16 uniform perennial vegetation cover with a density of 70% has been achieved in all portions
17 of the Project Area where ground disturbance occurred and there is no infrastructure.

18 The Applicant has created a Standard Operating Procedure (SOP) for the discovery
19 and management of contaminant-impacted soils during the construction phase of
20 Applicant's Facilities. This SOP outlines the roles and responsibilities of Applicant's
21 Personnel and the Construction Contractor (or EPC Contractor), if contaminant impacted
22 soil is detected during construction. This document provides tools for the identification of
23 contaminant impacted soil, the required materials needed for effective management of

1 contaminant impacted soil, and the reporting procedures both internally and externally
2 upon the discovery of contaminant impacted soils. A copy of the plan is provided in
3 **Appendix II Exhibit A-1.4.**

4 The Project completed a Phase I Environmental Site Assessment (“ESA”) in
5 February 2025 as a preliminary investigation of the Project Area environmental conditions.
6 The Phase I ESA was conducted in accordance with the Environmental Protection Agency
7 (EPA) All Appropriate Inquiries (AAI) Rule (40 CFR Part 312) and American Society for
8 Testing and Materials (ASTM) Standard E2247-23 (Standard Practice for Environmental
9 Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural
10 Property). Standard E2247-23 incorporates Standard E1527-21 (Standard Practice for
11 Environmental Site Assessments: Phase I Environmental Site Assessment Process [ASTM
12 2021]) by reference and is intended to be no less stringent than Standard E1527-21. The
13 goal of the processes established by this practice is to assess the property, to the extent
14 feasible pursuant to the processes prescribed in ASTM Standard E2247-23, for the presence
15 of recognized environmental conditions (“RECs”). The Project’s Phase I ESA included a
16 site reconnaissance of the Project Area, interviews with the property owners, and a review
17 of available environmental records concerning the properties and surrounding areas. Based
18 on the results of the findings from the assessment, assessment has revealed no RECs,
19 controlled RECs, or significant data gaps in connection with the subject property. Further
20 information can be found in the Phase I Environmental Site Assessment in **Appendix 2,**
21 **Exhibit A-1.4** Phase I ESA, which I have reviewed.

22 **Q. Describe grading and excavation issues related to the Project.**

1 A. The Project is mostly located on relatively flat, open, agricultural land requiring little
2 clearing and grading during construction, which minimizes the potential for erosion.
3 Construction of the Project will include limited grading of the topsoil as part of the
4 installation of Project infrastructure. At this stage of the Project, exact grading depths are
5 not known. It is anticipated that grading will involve cuts and fills within +/- 2 feet of
6 existing grade. However, localized high and low areas may require greater depths/heights
7 of cut and/or fill. Per equipment specifications slopes cannot be greater than 10%
8 East/West/South and 5% North. Project slopes are expected to be less than the maximum
9 design limit. The site design will be constructed using an approach that minimizes the
10 amount of on-site grading required by the racking manufacturer's design specifications and
11 the stormwater pollution prevention plan. Topsoil will be segregated on-site and de-
12 compacted prior to spreading over the areas to be restored. The disturbed areas will be
13 seeded to stabilize the Site after construction is completed. The Applicant will use, to the
14 extent practicable, a perennial pollinator seed mix, that meets the Michigan Pollinator
15 Habitat Scorecard, that will promote soil health, decompaction, and restoration during
16 operation of the Project as well as provide habitat to pollinators and other wildlife.

17 Minimal excavation for installment of infrastructure is anticipated for this Project.
18 A grading analysis will be performed as part of the site engineering design, and soil will
19 be cut and filled as necessary to maintain drainage and slope per equipment and site access
20 road needs. In areas where grading is needed, the topsoil will be stripped and stockpiled in
21 an upload area to be respread on the same land for permanent vegetation establishment.
22 Cable runs will be trenched as needed to minimize overall land disturbance. Each solar
23 module tracking system will be supported by steel posts driven into the ground. Each

1 tracker system will be supported by 10 or 15 steel piles, dependent on string length. The
2 entire system will be supported by approximately 120,000 steel piles installed with a pile-
3 driving machine. Grading will also be required for construction of both temporary and
4 permanent sediment basins. The grading and excavation activities required for the Project
5 will be conducted in accordance with county-level erosion control requirements and the
6 EGLE-issued Notice of Coverage under the National Pollutant Discharge Elimination
7 System permit. Refer to Sheet 30 in **Appendix II, Exhibit A-1.1** for details and typical
8 grading and excavation schematics for additional information.

9 **Q. Describe any construction of temporary and permanent access roads, staging areas,**
10 **laydown areas, and trenches associated with the Project.**

11 A. Access roads for the Project are likely to vary by use and under current plans will include
12 the following:

- 13 • Driveway entrances from the public right-of-way per Lenawee County Standard
14 may be up to 30 feet wide and may include culverts.
- 15 • Private on-site access roads to the Project substation will be approximately 20 feet
16 wide. These will be lined with geofabric and covered with 12 inches of gravel.
- 17 • Other private on-site access roads leading to inverters and transformers will be
18 approximately 12 feet wide. These will consist of compacted soil or gravel, as
19 needed.

20 Driveways from public roadways as well as internal access roads will be constructed to
21 allow access to the Project Site during construction and operation. Driveways located
22 outside of the security fencing will allow access to the public roadways.

1 Approximately 46,000 linear feet of internal access roads will be constructed. The
2 Project does not anticipate using existing access roads. The final location and length of
3 these internal access roads will depend on the final site design issued for construction but
4 will be within the Project Area. Access roads within and around the Project Area will be
5 designed with conventional stone at least 6 to 10 inches thick and engineered to support
6 project construction as well as post-construction traffic which will be primarily light
7 maintenance vehicles. The roads will meet the requirement to support a maximum vehicle
8 load of 80,000 pounds for fire truck access. In addition, the substation access road will be
9 able to support heavy vehicle delivery (HS-20 loading) up to two times per year throughout
10 the design life.

11 A large crane may be necessary for construction of the Project substation,
12 installation of inverters/transformers, or gen-tie line poles; however, given the location of
13 the substation within the facility and proximity to the existing roadway, a dedicated crane
14 path is not anticipated.

15 During construction, the Project plans to incorporate approximately five
16 construction laydown and staging areas for PV solar module construction and the
17 substation. Laydown areas will be prepared prior to the construction of access roads. Each
18 laydown area may include trailers, storage areas, a gravel parking lot, a water tank,
19 generators/power service, communications, and trash and recycling. These laydown areas
20 are within the Project Area and will total approximately 80 acres. Additionally, there may
21 be other areas used for laydown, assembly, cable pulling/tensioning, storage, etc., that may
22 be in and around the PV solar module areas within the Project Area. The exact location,
23 size, and quantity of temporary laydown areas will be determined by the general contractor

1 and will be located within the proposed limits of disturbance (“LOD”). Any internal access
2 roads may remain after the completion of construction. The laydown areas will be restored
3 to pre-construction contours and re-vegetated following construction if they are outside of
4 the PV solar module areas. Temporary sediment and erosion control measures will be
5 installed throughout the Project Area final plans.

6 Trenches and drainage basin systems may be constructed as needed to collect
7 stormwater.

8 **Q. Describe any stringing of cable or laying of pipe that may be involved in the Project.**

9 A. The PV solar modules will be connected electrically by direct current (DC) cabling. The
10 cabling can be either buried in a trench or secured on the tracking system. The DC cables
11 from all PV solar modules in each tracker connect to a combiner box that will be included
12 along with every few trackers. The output of several combiner boxes is then connected to
13 a single inverter housed in a power station which includes the inverter, DC and AC
14 switchgear, communications and control equipment, and a medium-voltage (MV)
15 transformer. The MV AC output of each power station is then connected to the MV
16 collector system at the Project’s substation via underground cables that run parallel to the
17 internal roads of the facility. The depth of the installed DC cables will be determined during
18 final engineering but is anticipated to be a minimum of 48 inches below grade in
19 accordance with the NEC.

20 According to current plans, the Project will not involve any laying of pipe.

21 **Q. Describe any installation of electric transmission line poles, including foundations.**

22 A. The Project will include approximately 46 inverters and power stations that will be installed
23 to convert the DC electrical power generated by the PV solar modules to AC electrical

1 power to be delivered to the POI. MV transformers will step up the AC to 34.5 kilovolts
2 (kV) and DC collection lines that collect the power from a specific set of trackers to a single
3 combiner box will be installed underground and/or above ground for the Project.

4 The AC collection system will be comprised of underground MV cable that will
5 transmit the power from each inverter/power station to the Project substation. The three-
6 phase 34.5-kV AC collection system with communication wire may be underground or
7 overhead. The collection system will total approximately 135,350 linear feet (26 miles) of
8 belowground or aboveground copper and aluminum wiring.

9 The Project will require one substation, which will include a step-up transformer
10 (34.5-kV low side and 138-kV high side voltage) and all protective, monitoring, and
11 control equipment required for this type of facility. An approximately 528-linear-foot (0.1-
12 mile), high-voltage (138-kV) gen-tie line will depart from the Project substation to the
13 Michigan Electric Transmission Company, LLC-owned substation, which will be the point
14 of interconnection of the Project. The gen-tie line will be hung on light-duty wood pole or
15 equivalent steel structure(s), monopole dead-ends that will be approximately 80 feet above
16 the ground. Additional structures will be required for lightning protection within the
17 substation and could exceed heights of 70 feet. The preliminary location for the Project's
18 substation and gen-tie line are shown on the Site Plan located in Appendix II Exhibit A-
19 1.1.

20 Applicant represents that all Project equipment will be compliant with applicable
21 Underwriters Laboratories, Institute of Electrical and Electronics Engineers, NEC,
22 National Electric Safety Code, and American National Standards Institute (ANSI) listings.

23 **Q. What will be the depth of any underground infrastructure related to the Project?**

A. The Project will install all underground collection outside the substation fence at a minimum of 4 feet below existing grade. Precise depths for utility crossings under county roads and county drains will be determined through further consultation with the Ingham County Road Department and Ingham County Drain Commission. Illustrative details are shown for underground collection on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1** and additional notes are provided in Solar Details & Construction Information on Sheet 16, both of which I have reviewed.

III. PROJECT SCHEDULE

Q. Provide a detailed schedule of planned construction activities, including planned construction start date and expected duration of construction.

A. Once approved by the Commission, the Project's construction activities are estimated to begin in October 2027. Construction is then expected to take approximately 1.5 years, with the anticipated completion date in the second quarter around June 2029. I have provided a more detailed breakdown of the Project's development stages from the establishment of the electrical queue position to the commercial operation date, which is included in the table below:

Rouget Road Solar Farm Development and Construction Schedule

Milestone		Date	Status
Queue Position Established		6/22/2023	Complete
Site Control Completed		11/1/2024	Complete
Environmental Studies Complete		Q2 2026	Complete
Technical Studies Complete		Q3 2025	Complete
Interconnection Executed	Agreement	Q4 2023	Complete
Discretionary Permits Secured		Q3 2027	Expected

Financing Secured	Q4 2026	Expected
EPC Contract Executed	Q4 2026	Expected
Construction Start	Oct 2027	Expected
Pile Installation	Q1 2028 – Q2 2028	Expected
Electrical Underground	Q1 2028 – Q3 2028	Expected
Tracker Installation	Q1 2028 – Q3 2028	Expected
Module Installation	Q2 2028 – Q4 2028	Expected
Delivery & Installation of Main Power Transformer	Q3 – Q4 2028	Expected
Energization for Interconnection	Q1 2029	Expected
Commissioning and Regulatory Testing	Q1 – Q2 2029	Expected
Commercial Operation Date	June 2029	Expected

Based on my knowledge of the Project, Applicant's development efforts began in March of 2021 with outreach to private landowners about the potential for executing long-term land leases for the Project. Work began on wildlife and environmental surveys in the third quarter of 2023 and were completed the second quarter of 2026. Cultural surveys began in the second quarter of 2025 and were completed in 2026. The results of all completed studies are incorporated into the Application and discussed in the appropriate Exhibits of this Application.

Interconnection studies for the Project began in 2020 and were completed in the second quarter of 2023. The Interconnection Agreement was executed in the 4th quarter of 2023. **Appendix II Exhibit A-12.**

Development of the Application for the MPSC commenced in the first quarter of 2025 and has been ongoing since then. The Application will be submitted to the MPSC in early September 2026. The Applicant anticipates that the certificate will be issued in the

1 fourth quarter of 2027. The Applicant anticipates that preparation of the final design,
2 marked by completion of 90% design, will commence in the first quarter of 2027 and be
3 completed during the fourth quarter of 2027.

4 A general contractor will be retained by the Applicant prior to the start of
5 construction to manage the equipment and material procurement, as well as all construction
6 permits required prior to groundbreaking. The general contractor will work with the
7 Applicant to finalize the site design and ensure that all applicable permits and approvals
8 have been obtained for the Project before construction commences.

9 Construction of the Project will begin with mobilization of construction staff and
10 equipment to the site to begin clearing of the Project site, installation of the erosion and
11 sediment control measures, followed by any necessary grading of the ground. The laydown
12 areas will be prepared, followed by construction of the access roads. Project equipment
13 including trackers, modules, cabling, inverters, transformers and all other components will
14 be installed on a carefully planned sequence across the site. As portions of the site are
15 complete, the temporary laydown areas will be restored and stabilized per the vegetation
16 management plan (**Appendix II Exhibit A-1.1**). Electrical equipment will be
17 commissioned to allow the Project to be placed in service. Once construction across the
18 entire site is complete, all temporary features like the construction trailer, remaining
19 construction and logistics areas, etc. will be removed and areas restored as necessary.

20 Delays to the in-service date of the Project could have deleterious effects to the
21 Project and could affect financing, equipment procurement, seasonal construction
22 windows, etc.

1 The above table reflects my best estimates, based on currently available
2 information, regarding the Project's schedule. As with any major development, some
3 variation is expected regarding both the details of any of these elements as well as the
4 projected date of completion. However, the schedule above and the descriptions below are
5 based on widely accepted methods for constructing and commissioning solar developments
6 analogous to the Project, and my understanding of issues specific to the Project.

7 **Q. Do you have expertise in each of the elements included in the project schedule**
8 **identified above?**

9 A. Yes. Based on my prior extensive experience involving projects similar to the Project's
10 type, size, and characteristics, including utility-scale solar projects, I have expert
11 knowledge regarding each element included in the above project schedule.

12 **Q. Can you please describe each of the elements included in the above project schedule?**

13 A. Yes. I have included a description of each of those elements below:

14 *Queue Position Established*

15 This describes the time at which the Project submitted an application to the Midcontinent
16 Independent System Operator ("MISO") Generator Interconnection Queue.

17 *Site Control Completed*

18 This element demonstrates the time at which Applicant had acquired real estate rights
19 sufficient to site a facility that would accommodate the Project's size and output. These
20 real estate rights are acquired through easements, purchase options, and transmission
21 facilities easement agreements with private landowners.

22 *Environmental Studies Complete*

1 This item refers to the Project's completion of expected surveys and studies necessary to
2 support various local, state, and federal permits as applicable. This includes completion of
3 a Wetland Delineation Report, a Threatened and Endangered Species Memorandum, and a
4 Phase I Environmental Site Assessment.

5 Technical Studies Complete

6 This element highlights the point at which any studies then known to be required, excluding
7 Environmental Studies, were completed for the Project. This includes the Sound Study and
8 Glare Study, as described elsewhere in Rouget Road's Application.

9 Interconnection Agreement Executed

10 This element refers to time at which Applicant entered into a Generator Interconnection
11 Agreement with MISO and Michigan Electric Transmission Company, LLC.

12 Discretionary Permits Secured

13 This refers to the expected time at which Applicant will receive a Renewable Energy
14 Certificate from the Commission upon granting Acceleration Solar's Application.

15 Financing Secured

16 The Project will secure debt financing to fund its construction phase. This important
17 milestone must be completed before the Engineering Procurement & Construction ("EPC")
18 Contract is executed.

19 EPC Contract Executed

20 The project will engage EPC contractor(s) to support the development and permitting
21 process. Prior to financing, this work will be completed via Limited Notice(s) to Proceed
22 ("LNTP") or Pre-Construction Services Agreement ("PCSA"). But after financing is

1 secured, the executed EPC contract(s) will cover the entirety of the Project through the
2 commercial operation date.

3 Construction Start

4 While some construction work may begin under LNTP or PCSA before financing is
5 secured and the EPC contract is executed, the vast majority of the work will begin post-
6 EPC contract execution. This element of the schedule is identified when construction crews
7 will mobilize to the site and begin grading and site preparation. Such work will include
8 best management practices as to stormwater and other features required under permits.

9 Pile Installation

10 Following site preparation, this element will involve the EPC beginning the process of
11 installing the steel piles to which the solar panels trackers (also known as
12 “racking”) will be affixed. Such trackers are devices that position the solar panels to align
13 with the direct rays of the sun in order to optimize panel efficiency. Piles are made of steel
14 and driven into the ground to support the trackers.

15 Electrical Underground

16 At this milestone, the Project will begin the installation of the electrical cable system that
17 will bring the power back to the substation. This element will typically begin shortly after
18 the start of construction and will run concurrent with the installation of the solar specific
19 equipment (which includes piles, trackers, etc.).

20 Tracker Installation

21 Because the Project plans to use a tracker style racking system, this element of the schedule
22 indicates the time at which the system will become affixed to the piles. Prior to this, all
23 piles would be installed and quality checked.

1 Module Installation

2 After the trackers are installed and quality checked, the solar panel modules will be
3 installed on the trackers. Each module will be connected electrically via a series of wire
4 that will feed into the electrical system.

5 Delivery & Installation of Main Power Transformer

6 The main power transformer is a key piece of electrical infrastructure for the substation.
7 Prior to delivering the main power transformer to the site, the Project will include building
8 roads (i.e., access roads) able to withstand the delivery of the equipment. Prior to installing
9 the main power transformer, the substation will be partially built out including a foundation
10 and pad on which the transformer will sit.

11 Energization for Interconnection

12 This element signifies that the substation, once completed, will be connected to the
13 electrical grid and energized. This detailed process will be completed in consultation with
14 MISO and Michigan Electric Transmission Company, LLC.

15 Commissioning & Regulatory Testing

16 At this milestone, there will be a number of different electrical and production tests
17 completed on the Project to ensure that it complies with regulatory requirements and the
18 EPC contract.

19 Commercial Operation Date

20 The commercial operation is when the Project will have met all of its requirements and
21 become fully operational in delivering solar power onto the electrical grid.

IV. PERMIT LIST AND STATUS

Q. As part of my pre-construction responsibilities, I have also managed the permitting process related to the Project. I have assisted with preparation of the below table, which includes detailed information regarding each permit's subject (type of permit), the responsible agency administering the permit/consultation issuance, and expected dates of submission and permit issuance. At the time of this Application's submission to the Commission, no permits have yet been issued. As permits are processed by relevant state and local agencies, Applicant will supplement its filing to ensure the Commission is properly informed. Current permit information is provided as follows:

V.Subject	Responsible Agency	Anticipated Date of Application Submission	Anticipated Date of Permit/Approval Issuance
Part 301, Inland Lakes and Streams Permit; Part 303, Wetlands Protection Permit	Michigan Department of Environment, Great Lakes, and Energy	Q1 2027	Q3 2027
Part 31 Water Resources, of the NREPA – Permit by Rule (R 323.2190); Notice of Coverage (NOC) National Pollutant Discharge Elimination System (NPDES) permit		Q1 2027	Q3 2027
Oversize/Overweight Vehicle Permit	Michigan Department of Transportation	Q1 2027	Q3 2027
Encroachment Permit		Q1 2027	Q3 2027
PA116	Michigan Department of Agriculture and Rural Development	Q4 2026	Q1 2027
Drive Access Permit	Lenawee County Road Commission	Q1 2027	Q3 2027
Driveway Permit		Q1 2027	Q3 2027
Right-of-Way Permit		Q1 2027	Q3 2027
Transportation Permit		Q1 2027	Q3 2027

Road Use Agreement		Q1 2027	Q3 2027
Drain Crossing Permit	Lenawee County Drain Commission	Q1 2027	Q3 2027
Part 91, SESC, of the Natural Resources and Environmental Protection Act (NREPA), of 1994 PA 451, as amended, Soil Erosion Permit	Lenawee County Drain Commission	Q1 2027	Q1 2027
Well and/or Sewage Disposal Construction Permit	Lenawee County Health Department	Q1 2027	Q1 2027
Building Permit	Palmyra Township	Q4 2027	Q4 2027
Electrical Permit	Palmyra Township	Q4 2027	Q4 2027
Mechanical Permit	Palmyra Township	Q4 2027	Q4 2027
Plumbing Permit	Palmyra Township	Q4 2027	Q4 2027
Utility Crossing Agreement	Citizens Light & Power Co.	Q3 2026	Q1 2027
Utility Crossing Agreement	Consumers Power Company, A Maine Corporation	Q3 2026	Q1 2027
Utility Crossing Agreement	Marathon Pipeline Company	Q3 2026	Q1 2027
Utility Crossing Agreement	Goetz River Farms, Inc., A Michigan Corporation	Q3 2026	Q1 2027
Utility Crossing Agreement	Midwest Energy Cell Tower	Q3 2026	Q1 2027

VI. LOCAL JOB CREATION AND PROJECT LABOR AGREEMENT

Q. Please describe how the Project will benefit the local community through job creation?

Both the construction and operation of the Project will benefit Lenawee County through creating jobs in the community. Applicant received estimates from Magnum Economics, which employed a regional economic implant modeling system known as “IMPLAN.” Among other economic benefits, Magnum Economics projected that the Project would directly support 37 construction-related jobs in Lenawee County. Additionally, the model estimates an additional 64 indirect and induced jobs would be supported at local businesses

1 through construction purchases and spending and when workers supported by the Project
2 spend their wages in the local community. Further, during operation of the Project, an
3 estimated 4 direct jobs would be created and an additional 10 indirect and induced jobs
4 would be supported through local operational spending and the local spending of workers
5 supported by the Project.

6 **Q. Will the Project utilize a Project Labor Agreement?**

7 A. Yes. The Applicant will require its EPC contractor to enter into a project labor agreement
8 (PLA), or similar agreement, with one or more labor organizations prior to the start of
9 construction. At this stage, Applicant has identified the International Brotherhood of
10 Electrical Workers Local 9 as a potential signatory. Applicant contacted the IBEW Local
11 8 to introduce the Project and obtain a point of contact. Jake Meyers, Lenawee County
12 representative, provided a copy of the union's National Tri-Trade Solar Agreement (refer
13 to **Appendix II Exhibit A-8.4**). Applicant has prepared a letter of intent to utilize a PLA,
14 which is provided in **Appendix II Exhibit A-8.4**. Applicant further commits to providing
15 a copy of the executed PLA or similar agreement to the Commission once it is available.

16 **Q. What are your recommendations to the Commission?**

17 A. I recommend approval of the Application as submitted.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ROUGET ROAD SOLAR FARM, LLC)
for a Renewable Energy or Storage)
Siting Certificate to construct a solar)
energy facility.)
_____)

Case No. U-22003

DIRECT TESTIMONY
OF
BLAKE HOLCOMB
ON BEHALF OF
ROUGET ROAD SOLAR FARM, LLC

APPENDIX I – EXHIBIT 4

September 4, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Blake Holcomb, and my business address is 567 Bishop Gate Lane, Jacksonville, Florida 32204.

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Rouget Road Solar, LLC (“Rouget” or “the Applicant”) in connection with its application to the Michigan Public Service Commission (“MPSC” or “Commission”) for the Rouget Road Solar Project (the “Project”). Rouget is a wholly owned subsidiary of RWE Clean Energy Development, LLC (“RWE”). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 175 MW of photovoltaic solar panels, to be located within Palmyra Township in Lenawee County, Michigan.

Q. Please summarize your educational background.

A. I hold a Bachelor of Science in Biosystems Engineering from Clemson University, which I obtained in 2004.

Q. By whom are you employed and in what position?

A. I am employed by SWCA Environmental Consultants, Inc. (“SWCA”) as a principal civil engineer. SWCA was engaged by the Applicant to provide consulting services relative to the Project, and to assist in compiling the present Application and associated materials.

Q. Please summarize your professional experience.

A. I have been a professional engineer licensed through the State of Florida since 2011. Additionally, I hold a certification issued by the Florida Department of Environmental

1 Protection in 2010 as a Qualified Stormwater Erosion and Sedimentation Control
2 Inspector.

3 In total, I have 20 years of experience in consulting, infrastructure design,
4 engineering, and permitting for power sector projects, and 10 years of practical experience
5 with renewable solar projects. I have been the Engineer of Record (EOR) for over 40
6 utility-scale solar projects across the state of Florida.

7 My roles with respect to previous renewable solar projects have ranged from EOR
8 to Project Manager. In those roles, I have conducted field investigations for various
9 engineering and environmental studies/inspections, secured stormwater permitting, and
10 generally ensured that the projects on which I have participated are designed and executed
11 in compliance with the state laws, regulations, and local ordinances concerning stormwater
12 and civil design.

13 **Q. Please describe your responsibilities at SCWA generally.**

14 A. As a principal civil engineer, I review, design, and execute plans, including stormwater and
15 pollution prevention plans. I also assist in ensuring regulatory and civil compliance for
16 renewable solar projects such as the Project. To that end, I review and conduct engineering
17 and environmental studies and inspections.

18 **Q. Please explain the basis for your knowledge regarding the Project.**

19 A. The Applicant engaged SWCA to provide consulting services and to assist in compiling
20 the present Application, including its related narratives and exhibits, as required by the
21 Public Act 233 ("PA 233") and the Application Filing Instructions and Procedures
22 ("AFIP"). Among other things, I assisted in preparing Rouget's present application and in
23 the review and acceptance of the exhibits referenced in my testimony.

1 **Q. Have you previously testified before the Michigan Public Service Commission**
2 **(“MPSC” or “Commission”) or other governmental agencies?**

3 A. No.

4 **II. PURPOSE OF TESTIMONY**

5 **Q. What is the purpose of your direct testimony?**

6 **Q.** My testimony summarizes the narratives and attached exhibits contained in Rouget’s
7 Application (the “Application”), which concern (i) the Project’s Site Plan and (ii) the
8 Project’s Preliminary Stormwater Mitigation Plan.

9 **Q. In connection with the Application, please identify the exhibits to which you are**
10 **testifying or that fall under your testimonial purview.**

11 A. I am sponsoring, and/or have testimonial purview, as to **Appendix II Exhibit A-1.1,**
12 **Appendix II Exhibit A-6.4,** and **Appendix II Exhibit A-10.** Other witnesses may also be
13 sponsoring or have overlapping testimonial purview as to some or all of the content
14 contained in the foregoing exhibits, as set forth in their respective testimonial submissions.

15 **III. PROJECT OVERVIEW AND SITE PLAN**

16 **Q. Please describe the Site Plan’s development and what it is intended to show.**

17 A. I oversaw SWCA’s development of the Site Plan (**Appendix II Exhibit A-1.1**). The Site
18 Plan relies on aerial photographs as the underlying “map” upon which SWCA applied
19 visual overlays to identify existing and proposed conditions relative to the Project. As to
20 existing conditions, the Site Plan identifies participating and nonparticipating parcel
21 boundaries, occupied structures, public roads, railroads, public rights-of-way, existing
22 public utilities, and approximate easement locations using publicly available geographic

1 information system (“GIS”) data, as well as survey data maintained by the American Land
2 Title Association (“ALTA”).

3 As to proposed conditions, the Site Plan identifies planned facilities, fences, access
4 paths, buildings, planned screening, landscaping, and vegetative cover. The Site Plan also
5 identifies the utility interconnection location, as well as clearing locations and disturbance
6 limits. As to proposed ancillary features required for construction and operation of the
7 Project, the Site Plan identifies internal access paths, substations, switchyards, and laydown
8 areas.

9 The Site Plan contains dimensioned maps illustrating setbacks to proposed fencing,
10 property lines, waterbodies, and occupied structures. While there are no significant
11 institutions, parks, or recreational areas located within 1,000 feet of the Project, the Site
12 Plan shows that a 2,015-foot portion of the Palmyra River Raisin Railroad exists within
13 1,000 feet of the Project. Existing waterbodies within 1,000 feet of the Project are also
14 included in the Site Plan, including River Raisin, which exists east of the Project boundary
15 but will not be impacted by the Project.

16 Finally, the Site Plan includes a detailed description of the maximum height of the
17 proposed solar panel arrays and associated electrical equipment (see Sheet 31 of the Site
18 Plan in **Appendix II Exhibit A-1.1**). That description indicates that the proposed solar
19 panel array will be compatible with overhead communication and electrical transmission
20 lines. The proposed solar panel components will not exceed a maximum height of 14 feet
21 above ground when the arrays are at full tilt, well below the statutory maximum of 25 feet.

22 **Q. Describe SWCA’s involvement in the development of planned screening, landscaping,**
23 **and vegetative cover.**

1 A. SWCA assisted Applicant in identifying reasonable plans to address areas of the Project
2 that may not already have sufficient natural vegetative screening or other obscuring
3 structures. The Site Plan included in **Appendix II Exhibit A-1.1** uses aerial photographs
4 as the underlying maps upon which overlays were applied to identify planned facilities,
5 fences, roads, occupied buildings, and planned screening, landscaping, and vegetative
6 cover. The Project proposes to use fencing and screening to minimize the visual impact of
7 the Project. The Project's proposed screening plan takes into account various aspects of
8 local ordinances as well as feedback received from local community members.

9 **Q. Describe the Project's proposed setback locations from the project boundary and**
10 **fences to all structures, road rights-of-way, waterways, wetlands, and property lines.**

11 A. The Site Plan adheres to all MPSC setback requirements as defined in PA 233 at Section
12 226(8) and MCL 460.1226(8). The Site Plan identifies such setbacks as follows:

- 13 (1) 300-foot setbacks from the nearest point on the outer wall of any occupied
14 community building or dwelling on non-participating properties;
15 (2) 50-foot setbacks from the nearest edge of public road rights-of-way;
16 (3) 50-foot setbacks from the shared property line of any adjacent non-participating
17 parcel.

18 All solar equipment and infrastructure are sited in full compliance with the required
19 setback standards. Site planning incorporated aerial imagery, parcel boundaries, and field
20 verification to ensure adherence. Refer to proposed setbacks and proposed conditions in
21 the Site Plan in **Appendix II Exhibit A-1.1**. The Site Plan includes a dimensioned map
22 showing setbacks from the Project boundary and fences to all structures on participating
23 properties, road rights-of-way, waterways, wetlands, occupied structures on non-

1 participating properties, and property lines of non-participating properties. Such setbacks
2 are depicted on Sheet 6 of the Site Plan in **Appendix II Exhibit A-1.1**.

3 **Q. Are there any significant institutions, parks, recreational areas, or waterbodies within**
4 **1,000 feet of the Project?**

5 A. There are no major institutions, parks, or recreational areas within 1,000 feet of the Project
6 (see Sheet 3 of the Site Plan in **Appendix II Exhibit A-1.1**). Additionally, the Site Plan
7 illustrates River Raisin within 1,000 feet of the proposed Site. River Raisin is east of the
8 Site boundary and will not be impacted by the Project. Wetlands, streams, drains, and other
9 aquatic features delineated during field reconnaissance are noted on Sheets 3 through 5 of
10 the Site Plan in **Appendix II Exhibit A-1.1**.

11 **Q. Describe the legal boundaries of cities, villages, townships, and counties within 1,000**
12 **feet of the Project.**

13 A. There are no legal boundaries within 1,000 feet of the Project Area. The Project is located
14 wholly within Palmyra Township, Lenawee County, Michigan, as noted on the Site Plan
15 in **Appendix II Exhibit A-1.1**.

16 **Q. Are there any occupied structures within 1,000 feet of the Project?**

17 A. Yes. The Site Plan assumes that all structures within 1,000 feet of the Project are occupied.
18 Such structures are illustrated on the Site Plan as black boxes on Sheets 7 through 19 of
19 **Appendix II, Exhibit A-1.1**.

20 **Q. Please identify participating properties and adjacent properties relative to the Project**
21 **Area.**

1 A. Participating properties are identified on Sheet 2 of the Site Plan in **Appendix II Exhibit**
2 **A-1.1**. The Site Plan also identifies rights-of-way and adjacent properties relative to the
3 Project Area, which are illustrated on Sheets 7-19 in **Appendix II Exhibit A-1.1**.

4 **Q. Describe Applicant's plans concerning proposed limits of clearing or disturbance for**
5 **construction of the Project.**

6 A. Proposed tree clearing areas and approximate limits of disturbance for the Project are
7 illustrated on Sheets 7 through 19 in **Appendix II Exhibit A-1.1**. The primary proposed
8 temporary laydown area is located on parcels PA0-121-4050-00 and PA0-122-3155-00 as
9 noted by Sheet 14 in **Appendix II Exhibit A-1.1**. The remaining laydown yards are
10 illustrated on Sheets 7-7A, 16, and 18-19 in **Appendix II Exhibit A-1.1**. The Project
11 contains no temporary staging or storage areas.

12 **Q. Identify the location of utility interconnections available to the Project, including any**
13 **electrical or communication lines, stormwater drainage lines, or county/intercounty**
14 **drains.**

15 A. The proposed Point of Interconnection ("POI") is identified on Sheet 9 of the Site Plan in
16 **Appendix II Exhibit A-1.1**. The Site Plan identifies all known existing electric
17 transmission lines, communication lines, stormwater drainage lines, and county and
18 intercounty drains on Sheets 7 through 19 of the Site Plan in **Appendix II Exhibit A-1.1**.

19 **IV. PRELIMINARY STORMWATER MITIGATION PLAN**

20 **Q. Please describe the Project's Stormwater Mitigation Plan and what it is intended to**
21 **show.**

22 A. The Project will involve the creation of a large scale solar facility with a fenced-in area of
23 approximately 1,042 acres (and a total project area of 2,132.84 acres), including the

1 installation of access paths and pads on property that has a current and predominate use as
2 agricultural. Approximately 42.55 acres of impervious area are proposed to support the
3 proposed gravel access paths and pads associated with the Project.

4 The Stormwater Mitigation Plan ("Plan") is intended to describe the Applicant's
5 pre-construction review and planning relating to stormwater drainage, consultations with
6 local drainage officials, and future (both pre- and post-construction) plans related to
7 assuring that there is no unreasonable effect on stormwater drainage as a result of the
8 Project.

9 SWCA, in tandem with the Applicant, developed the Minimize, Mitigate, and
10 Repair Plan ("MMR") contained within **Appendix II Exhibit A-6.4** to summarize
11 measures the Applicant will take and anticipated results as it relates to reducing overall
12 runoff quantity, protecting water quality, enhancing drain capacity, and otherwise
13 addressing potential stormwater impacts both during and after construction.

14 While discussions with the Lenawee County Drain Commission ("LCDC") will
15 necessarily continue prior to and during construction, the Plan summarizes LCDC guidance
16 to date and explains how the Applicant's design approach has been tailored to that
17 guidance. Both pre- and post-construction drainage has been modeled as described in the
18 Plan and based on hydrological analysis of, among other things, prominent soil types at the
19 Project Site. A comprehensive summary of soil types relative to the Project is shown on
20 the USDA soil survey provided in **Appendix II Exhibit 6.4**.

21 Based on Site design, peak flow analysis for 10-year, 25-year, and 100-year storm
22 events has been modeled at multiple nodes, with results indicating that peak discharge rates
23 for post-development conditions are lower than the pre-development peak discharge rates

1 for the storm events evaluated. The Plan further concludes that the proposed Project will
2 result in a net improvement in stormwater quality.

3 The Plan concludes by describing the Applicant's intent to prepare a Stormwater
4 Pollution Prevention Plan ("SWPPP") in accordance with the requirements of the EGLE
5 Construction Storm Water General Permit ("CGP"), the Natural Resources and
6 Environmental Protection Act (NREPA), Part 91 – Soil Erosion and Sedimentation Control
7 (MCL 324.9101–324.9123), the requirements of the LCDC, and the MPSC. The Plan
8 further lists the intended elements of the SWPPP and presents a summary of the required
9 regulatory permits and notices to be completed both before and during construction
10 (including a Permitting Matrix Summary). The Applicant has committed to not
11 commencing construction until all necessary permits are obtained and all regulatory
12 conditions are satisfied.

13 **Q. Describe the process by which the Stormwater Mitigation Plan was created and**
14 **reviewed, including steps taken to obtain necessary permits or approvals.**

15 A. I worked in conjunction with Carol McKnight; Matt Pierce, PE; and Ian Gstalder to create
16 and review the Project's Plan. As described in **Appendix II Exhibit A-6.4**, representatives
17 from Rouget and SWCA met with staff from the Lenawee County Drain Commission
18 ("LCDC") in June of 2025 to discuss design requirements and stormwater mitigation
19 measures appropriate for the Project. Drainage calculations and preliminary detention
20 storage volume calculations were completed for the Project in accordance with the design
21 consultations earlier held with the LCDC. The Plan also details necessary permits and
22 anticipated timelines for both LCDC and EGLE permitting consistent with Part 91 of

1 NREPA. Refer to Table 15 of **Appendix II Exhibit A-6.4** for the Permitting Matrix
2 Summary.

3 **Q. Describe the Minimize, Mitigate, and Repair Plan associated with the Project.**

4 A. As noted above, the MMR summarizes measures the Applicant will take and their
5 anticipated results regarding reducing overall runoff quantity, protecting water quality,
6 enhancing drain capacity, and otherwise addressing potential stormwater impacts both
7 during and after construction.

8 As to minimization measures, the MMR confirms that the Applicant will improve
9 ground cover by converting croplands to meadows with disconnected gravel drives, limit
10 grading to existing tributary areas, and establish permanent vegetation, which will have the
11 effect of reducing and filtering stormwater runoff and prevent accelerated soil erosion. The
12 setbacks reflected in **Appendix II Exhibit 1.1** are designed to offer more space for runoff
13 capture and filtration. As an additional measure, the Applicant will conduct field
14 investigations and surface probing (if necessary) to identify drain tiles that may be in
15 conflict with Project improvements.

16 As to mitigation measures, the MMR provides for (among other features) detention
17 basins, vegetated buffers, and culvert crossings (constructed in accordance with
18 LCDC/EGLE guidelines), which will ensure that there will be no net increase in runoff
19 resulting from the Project. Should it be determined that the Project design cannot
20 accommodate the current location, the MMR provides measures for relocation of drain
21 tiles, flowage easements, and construction dewatering.

22 As to repair measures, the MMR confirms that the Applicant will apply temporary
23 Soil Erosion and Sediment Control (“SESC”) BMPs such as seed and mulch, silt fences,

1 check dams, rock filters, sediment basins, and tracking mats to reduce construction-related
2 erosion. Additionally, the MMR provides for reseeding and revegetation to replenish
3 ground cover. Rouget will clean, clear, repair, or replace drains and culverts damaged by
4 Project activity.

5 Finally, the MMR confirms that Rouget will engage an Engineering, Procurement,
6 and Construction (“EPC”) contractor charged with providing a responsive plan to address
7 frac-out of drilling fluids. The MMR confirms that the frac-out responsive plan will be
8 created in accordance with the guidelines identified in Section 2.2 of **Appendix II Exhibit**
9 **A-6.4.**

10 **Q. Please describe the pre-development drainage conditions relative to the Project, and**
11 **the methodologies and processes used to measure the same.**

12 A. SWCA reviewed the Federal Emergency Management Agency (“FEMA”) Floodplain
13 Panel ID Numerical 26091C0225D and 26091C0350D (effective date 08/15/2019) and
14 determined that the Project lies within Flood Zone X and Flood Zone A. Elevations within
15 the Project Area range from approximately 780 feet NAVD88 to 692 feet NAVD88. Using
16 the LIDAR topographical survey data, the overall watershed boundary was determined.
17 The existing ground within the Project Area generally drains west to east, discharging into
18 a network of Lenawee County Drainage Commission ditches that traverse through the
19 proposed Site Plan boundary area. Existing National Land Cover Database (“NLCD”) land
20 cover types were identified within each basin and were either confirmed or adjusted based
21 on desktop verification. Composite Facility runoff curve numbers (“CN”) and time of
22 concentration calculations were completed for each basin. Hydraulic and hydrologic
23 modeling was completed to simulate pre-development stages, routing, runoff volumes, and

1 peak flows for each drainage basin across the Project using Stormwise. The results of
2 SWCA's pre-development drainage analysis are contained in Section 3.1 of **Appendix II**
3 **Exhibit A-6.4.**

4 **Q. Please describe the post-development drainage conditions relative to the Project, and**
5 **the methodologies and processes used to measure the same.**

6 A. The EPC contractor will be responsible for developing the mass grading plan and final size,
7 locations, and outfall structures for the stormwater management system during the final
8 design phase. The EPC contractor will ensure that post-development hydrologic and
9 hydraulic modeling processes, including SCS TR-55 and CN methodologies, the
10 Stormwise modeling approach, and boundary condition nodal connectivity are consistent
11 with the pre-development modeling processes. SWCA's present analysis indicates that
12 post-development basin boundaries are consistent with pre-development basin boundaries
13 based on the design approach, and determined that a reduction in peak flow rates are
14 expected due to improved land cover conditions for the Project. The results of SWCA's
15 post-development drainage analysis are contained in Section 3.2 of **Appendix II Exhibit**
16 **A-6.4.**

17 V. CONCLUSION

18 **Q. What are your recommendations to the Commission?**

19 A. I recommend approval of the Application as submitted.

20 **Q. Does this conclude your direct testimony?**

21 Yes.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ROUGET ROAD SOLAR FARM, LLC)
for a Renewable Energy or Storage)
Siting Certificate to construct a solar)
energy facility.)
_____)

Case No. U-22003

DIRECT TESTIMONY
OF
MATT PIERCE
ON BEHALF OF
ROUGET ROAD SOLAR FARM, LLC

APPENDIX I – EXHIBIT 5

September 4, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Matt Pierce, and my business address is 80 Emerson Lane, Suite 1306, Pittsburgh, PA 15017.

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Rouget Road Solar Farm, LLC (“Rouget Road” or “Applicant”) in connection with its application (the “Application”) to the Michigan Public Service Commission (“MPSC” or “Commission”) for the Rouget Road Solar Farm Project (the “Project”). The Project is a proposed solar energy facility that will include a nameplate capacity of up to 175 Megawatts of photovoltaic solar panels, to be located in Palmyra Township, Lenawee County, Michigan.

Q. Please summarize your educational background.

A. I hold a Bachelor’s in Science in Civil and Environmental Engineering from the University of Pittsburgh. I have additionally completed professional training related to environmental engineering, including McCoy RCRA (Hazardous Waste) Certification (2011), Georgia Soil and Water Conservation Commission Level II Design (2023), and Level 1 Rosgen (Hydrology) Training with the Resource Institute (2021).

Q. Do you hold any licenses or professional certifications?

A. In addition to the trainings described above, I am a licensed professional engineer in more than twenty states, including Michigan (No. 6201310776, as of 2022). I also hold a HAZWOPER Certification from the Occupational Safety and Health Administration (since 2015).

Q. Please summarize your professional experience.

1 A. I have 19 years of experience in civil engineering and project management. My work has
2 included erosion and sediment control layout and design, environmental permitting, and
3 Resource Conservation and Recovery Act (RCRA) and Toxic Substances Control Act
4 compliance. My project work has also included earthwork cut/fill analysis, radioactive and
5 hazardous materials coordination, site hydraulic and hydrology analysis, landfill gas
6 extraction, and leachate collection design.

7 I regularly provide engineering services on large scale projects, including
8 stormwater management, construction plan design, and quality assurance as a project
9 consultant. I have further served as the engineer of record for more than 100 energy
10 projects, including multiple large scale solar projects throughout the United States.

11 **Q. By whom and in what capacity are you employed?**

12 A. I am employed as Engineering Director by SWCA Environmental Consultants ("SWCA").

13 **Q. What is SWCA?**

14 A. SWCA is a nationwide, 100% employee-owned environmental consulting firm that
15 provides a full spectrum of environmental and management consulting services. It has over
16 1,700 employees across more than 45 offices in the United States and Mexico.

17 **Q. Please describe your work at SWCA generally.**

18 A. I provide full engineering design for a variety of projects on which SWCA has been
19 retained as a consultant. In addition to permitting support, my design work includes layout,
20 access road design, stormwater management, erosion and sediment control, site evaluation,
21 survey services, and preconstruction development services, among other areas. I have
22 worked while at SWCA as an engineering consultant on large-scale solar and other
23 renewable energy projects, including, but not limited to, more than 40 solar energy projects

1 in Pennsylvania, a 3,030-acre solar development project in Colorado, and eight
2 community-scale solar projects in Ohio.

3 **II. PURPOSE AND SCOPE OF TESTIMONY**

4 **Q. Please describe your role as respects the Project specifically.**

5 A. I provided general civil engineering support during Project planning and development,
6 working with Carol McKnight and others at SWCA as needed. I have reviewed and
7 participated in the Stormwater Mitigation Plan (Exhibit A-6.4), where I am a listed author
8 in addition to Blake Holcolm, PE, and Ian Gstalder.

9 **Q. In connection with the Application, please identify the exhibits which you are**
10 **sponsoring.**

11 A. I am sponsoring, and/or have testimonial purview, as to Exhibit 6.4, including the
12 embedded Minimize, Mitigate, and Repair Assessment (“MMR”) contained therein. Other
13 witnesses may also be sponsoring or have overlapping testimonial purview as to some or
14 all of the content of the foregoing exhibits as set forth in their respective testimonial
15 submissions.

16 **III. STORMWATER MITIGATION**

17 **Q. Please describe the Applicant’s Stormwater Mitigation Plan.**

18 A. The Project will involve the creation of a large-scale solar facility with a fenced-in area of
19 approximately 1,042 acres (and a total project area of 2,132.84 acres), including the
20 installation of access paths and paths on property that has a current and predominate use as
21 agricultural. Approximately 42.55 acres of impervious area are proposed to support the
22 proposed gravel access paths and pads associated with the Project.

1 The Stormwater Mitigation Plan (“Plan”) is intended to describe the Applicant’s
2 pre-construction review and planning relating to stormwater drainage, consultations with
3 local drainage officials, and future (both pre- and post-construction) plans related to
4 assuring that there is no unreasonable effect on stormwater drainage as a result of the
5 Project.

6 SWCA, in tandem with the Applicant, developed the Minimize, Mitigate, and
7 Repair Plan (“MMR”) contained within Exhibit A-6.4 to summarize measures the
8 Applicant will take and anticipated results as relates to reducing overall runoff quantity,
9 protecting water quality, enhancing drain capacity, and otherwise addressing potential
10 stormwater impacts both during and after construction.

11 While discussions with the Lenawee County Drain Commission (“LCDC”) will
12 necessarily continue prior to and during construction, the Stormwater Mitigation Report
13 summarizes LCDC guidance to date and explains how the Applicant’s design approach has
14 been tailored to that guidance. Both pre- and post-construction drainage has been modeled
15 as described in the Plan and based on hydrological analysis of, among other things,
16 prominent soil types at the Project site. Based on site design, peak flow analysis for 10-
17 year, 25-year, and 100-year storm events has been modeled at multiple nodes, with results
18 indicating that peak discharge rates for post-development condition are lower than the pre-
19 development peak discharge rates for the storm events evaluated. The Report further
20 concludes that the proposed facility will result in a net improvement in stormwater quality.

21 The Plan concludes by describing the Applicant’s intent to prepare a Stormwater
22 Pollution Prevention Plan (“SWPPP”) in accordance with the requirement of an EGLE
23 Construction Storm Water General Permit and Part 91 of NREPA, as well as any

1 requirements imposed by the LCDC and MPSC. It further lists the intended elements of
2 the SWPPP and presents a summary of the required regulatory permits and notices to be
3 completed both before and during construction (including a Permitting Matrix Summary).
4 Applicant has committed to not commencing construction until all necessary permits are
5 obtained and all regulatory conditions are satisfied.

6 I have reviewed the Stormwater Mitigation Plan generally, including its
7 appendices; the Plan and its appendices are complete and accurate to the best of my
8 information and belief.

9 IV. CONCLUSION

10 **Q. What are your recommendations to the Commission?**

11 A. I recommend approval of the Application as submitted.

12 **Q. Does this conclude your direct testimony?**

13 A. Yes.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ROUGET ROAD SOLAR FARM, LLC)
for a Renewable Energy or Storage)
Siting Certificate to construct a solar)
energy facility.)

Case No. U-22003

DIRECT TESTIMONY

OF

RYAN RUPPRECHT

ON BEHALF OF

ROUGET ROAD SOLAR FARM, LLC

APPENDIX I – EXHIBIT 6

September 4, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Ryan Rupprecht. My primary business address is SWCA Environmental Consultant's Philadelphia office, which is located at 1101 Telegraph Road, Building B West Chester, PA 19380.

Q. On whose behalf are you providing this testimony?

A. I am submitting testimony on behalf of Rouget Road Solar Farm, LLC ("Rouget Road Solar Project" or the "Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Rouget Road Solar Farm Project (the "Project"). The Project is a proposed solar energy facility that will include a nameplate capacity of up to 175 Megawatts of photovoltaic solar panels, to be located in Palmyra Township, Lenawee County, Michigan.

Q. By whom are you employed and in what capacity?

A. Since January 2022, I have been employed by SWCA Environmental Consultants; my current role is Strategic Growth Director from the Midwest Northeast region. In that role, I manage and oversee projects for utility-scale renewables, electrical transmission lines, refineries, power plants, petrochemical facilities, and gas/oil pipelines.

Q. Please summarize your educational background.

A. I have a Bachelor of Science degree in Biological Oceanography from Millersville University, which I obtained in 2000.

Q. Please summarize your professional experience.

A. I have worked for over 20 years in the environmental consulting industry. Since November 2004, I have specialized in National Environmental Policy Act (NEPA) compliance,

1 navigating state siting boards requirements, preparing Environmental Assessments (EAs)
2 and Environmental Impact Statements (EISs), and ensuring adherence to federal, state, and
3 local permitting requirements. Prior to joining SWCA, I was employed by Cardno, most
4 recently as the National Renewables Practice Lead overseeing a multidisciplinary team
5 delivering environmental consulting services for utility-scale solar, wind, and energy
6 storage projects. Throughout my tenure at Cardno, I had responsibility over procuring and
7 managing national client project portfolios, supporting permitting, design, and construction
8 for utility scale renewable energy projects, including solar projects. I also supported
9 electrical transmission, gas pipeline, power plants and refineries permitting, compliance,
10 and construction. Before my 15 years at Cardno, I worked for URS corporation in the water
11 Resources Group, where I was primarily involved in permitting and compliance of the
12 power/energy industry under the Clean Water Act, Section 316(a) and (b), Section 404,
13 Section 401, and Section 402.

14 **Q. Please summarize the testimony you intend to provide to the Commission.**

15 A. My testimony is intended to explain the Project's decommissioning plan as instructed by
16 the Commission's relevant guidance and consistent with industry best practices.

17 **Q. Please explain the basis for your knowledge regarding the Project.**

18 A. At SWCA, I primarily serve as a Task Lead and Senior Reviewer for the development of
19 the Project's Decommissioning Plan, as well as reviewed various other sections of the
20 application and provided strategic oversight to the SWCA team that has worked on the
21 Project.

22 **Q. In connection with the Application, please identify the exhibits to which you are**
23 **testifying or that fall under your purview?**

1 A. I am sponsoring and/or have testimonial purview, as to the following exhibits in **Appendix**
2 **2: Exhibit 13.1** (decommissioning plan), **Exhibit 13.2** (decommissioning cost estimate),
3 and **Exhibit 13.3** (proposed decommissioning agreement). Other witnesses may also co-
4 sponsor or have overlapping testimonial purview as to some or all of the content of the
5 foregoing exhibits as set forth in their testimonial submissions.

6 II. DECOMMISSIONING PLAN

7 Q. Are you able to explain information related to the Project's planned
8 decommissioning?

9 A. Yes. Based on my experience and knowledge of the industry and work on behalf of
10 Applicant to prepare the Project's decommissioning plan, I am able to provide testimony
11 that explains the Project's planned decommissioning as currently intended by Applicant.

12 Q. Please explain detailed decommissioning plan submitted for the Project?

13 A. Applicant commissioned SWCA to prepare a decommissioning plan and related cost
14 estimate for the Project. See **Appendix II, Exhibit A-13**. I was tasked with the primary
15 responsibility at SWCA for preparing the decommissioning plan for the Project and
16 addressing any related issues.

17 The decommissioning plan explains how the Project will be dismantled including
18 the removal of Project infrastructure and equipment, management of hazardous materials,
19 and cost estimate for the decommissioning of the Project, which is provided in Section 4
20 of the Decommissioning Plan. See **Appendix II Exhibit A-13**. That estimate reflects the
21 projected cost for restoring participating properties to useful condition similar to that which
22 existed before construction, including removal of above-surface facilities and
23 infrastructure that have no ongoing purpose. Those costs include detailed estimates for

1 removal of energy facility equipment and infrastructure, land restoration and reclamation,
2 liability insurance, and costs of managing the decommissioning process that Applicant
3 expects will be associated with restoring the relevant properties to their prior useful
4 condition. Before sponsoring Applicant's decommissioning plan as an exhibit, I reviewed
5 the plan with SWCA for completeness and accuracy.

6 The plan contemplated an approximate lifespan of 35 years, after which the land
7 will be reclaimed to reengage in agricultural use or revegetated or reseeded with native
8 plants according to the land owner and/or Lenawee County Environmental Policies. It also
9 identifies certain examples that would trigger applicant-initiated decommissioning.

10 Section 4.1 of the decommissioning plan also includes an estimate of
11 decommissioning costs. That estimate reflects the projected cost for restoring participating
12 properties to useful condition similar to that which existed before construction, including
13 removal of above-surface facilities and infrastructure that have no ongoing purpose. Those
14 costs include detailed estimates for removal of energy facility equipment and
15 infrastructure, land restoration and reclamation, liability insurance, and costs of managing
16 the decommissioning process that Applicant expects will be associated with restoring the
17 relevant properties to their prior useful condition.

18 Section 4.2 of the Decommissioning Plan also contains an estimate of the salvage
19 value for energy facility equipment and infrastructure associated with the Project.
20 **Appendix II Exhibit A-13.** SWCA estimates that the revenue derived from salvage will
21 total \$2,239,611.11. Applicant plans to reassess all decommissioning figures periodically
22 as the Commission may require.

1 I have also reviewed the proposed decommissioning agreement for the Project,
2 which can be found as Exhibit B to the Project's decommissioning plan. As that proposed
3 decommissioning agreement shows, Applicant plans to follow the sample
4 decommissioning agreement provided by the Commission without alteration.

5 **Q. What are your recommendations to the Commission?**

6 A. I recommend approval of the Application as submitted.

7 **Q. Does this conclude your direct testimony?**

8 A. Yes.