



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
PUBLIC SERVICE COMMISSION

MARLON I. BROWN, DPA  
DIRECTOR

KATHERINE PERETICK  
COMMISSIONER

DAN SCRIPPS  
CHAIR

SHAQUILA MYERS  
COMMISSIONER

Mr. Brandon Hubbard  
Dickinson Wright PLLC  
123 W. Allegan St, Ste. 900  
Lansing, MI 48933

**RE: Case No. U-21932** – In the matter of the application of ACCELERATION SOLAR, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.

August 1, 2025

Dear Mr. Hubbard,

On June 18, 2025, Acceleration Solar, LLC (applicant) filed an application with the Michigan Public Service Commission (Commission) for a certificate under Section 222(2) of Public Act 233 of 2023 (PA 233). The proposed project presented in the application is a solar energy facility with a proposed output of approximately 90 MW<sub>AC</sub> to be located in Leslie, Onondaga, and Vevay Townships, Ingham County.

Under Section 225(2) of PA 233, the Commission is required to determine whether the application is complete within 60 days of submission. A complete application is one which complies with the requirements of Section 225(1) of PA 233, as applied through the Commission's Application Filing Instructions and Procedures (AFIP) and other orders and guidance materials.

Consistent with Section 225(2) of PA 233 and AFIP 4(a)(4), this memorandum serves to notify you that Commission Staff has completed its review of the application and determined that the application is incomplete. A description of application deficiencies and the information necessary to make the application complete is included with this memo.

Additional filings are required if the application is to proceed. The applicant may make changes to its application to correct the deficiencies and resubmit its new application, which Commission Staff will again review for sufficiency and completeness. Along with additional documentation, Staff also requests the applicant file an updated Exhibit A-16, identifying portions of the application where changes or updates were made. Please be aware that application information not identified as incomplete may still require further development and submissions from the applicant in the course of the Commission's review process. Further, information submitted to cure items identified as incomplete will be subject to further review by Staff, and may also require further development and submission from the applicant. This memorandum is intended to

**LARA is an equal opportunity employer/program.**

**Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.**

7109 W. SAGINAW HIGHWAY • P.O. BOX 30221 • LANSING, MICHIGAN 48909 • [www.michigan.gov/mpsc](http://www.michigan.gov/mpsc) • 517-284-8100



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
PUBLIC SERVICE COMMISSION

MARLON I. BROWN, DPA  
DIRECTOR

KATHERINE PERETICK  
COMMISSIONER

DAN SCRIPPS  
CHAIR

SHAQUILA MYERS  
COMMISSIONER

address only the process identified in Section 225(2) of PA 233 and AFIP 4(a)(4) and nothing in this memorandum should be construed as addressing the sufficiency of the applicant's filing under Section 226(7) of PA 233 for issuance of a certificate.

To request further information or with questions, please email [LARA-MPSC-Siting@michigan.gov](mailto:LARA-MPSC-Siting@michigan.gov), which will reach the Michigan Public Service Commission's Renewable Energy and Storage Siting Section.

**LARA is an equal opportunity employer/program.**

**Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.**

7109 W. SAGINAW HIGHWAY • P.O. BOX 30221 • LANSING, MICHIGAN 48909 • [www.michigan.gov/mpsc](http://www.michigan.gov/mpsc) • 517-284-8100

The below list contains items determined to be incomplete in Staff's review. The order of incomplete items aligns with the application as filed. Each item is labeled according to the requirement of the Commission's Application Filing Instructions and Procedures and/or law. Where possible, Staff included descriptions of what may be provided to complete the application as filed.

### **Exhibits A-1.1 through A-1.16 (Site Plan)**

1. (AFIP 7) – Assure all items provided are clear and legible, which in some instances may entail providing the below items on separate layers, separate maps, or by showing some areas on another scale.

### **Exhibit A-1.1 (Planned Facilities)**

2. (AFIP 7; AFIP 7.1(a)(3)) – Provide drawings clearly delineating the limits of clearing and disturbance for construction of the facility and ancillary features on the Site Plans.
3. (AFIP 7.1(a)(5)) – Provide a map showing the full length of the waterbody identified in parcel 33-13-13-01-200-014, or identify where it is provided in the application.
4. (AFIP 7.1(b)) – Provide clear depictions of the planned locations of the vegetative cover that are proposed, including e.g., labeling individual pollinator seed mixes.
5. (AFIP 7; AFIP 7.1(c); AFIP 7.1(a)(7); AFIP 7.1(a)(9); AFIP 6.3.10(a)(1)) – The dimensioned drawings of the project provided, including Appendix 2 Exhibit A-1.1 Sheets 6-9, contain the following items lacking clarity/legibility. Provide dimensioned drawings or maps consistent with the requirements of AFIP 7.1 which resolve these items. Multiple maps may be provided for different features to avoid cluttering.
  - a. The measurements within the drawings are inconsistent with the scale provided.
  - b. The drawings fail to distinguish between occupied and unoccupied structures, or between participating and non-participating properties.
  - c. The drawings, in many instances, do not provide the measurements between features and the project fence.
  - d. The drawings do not identify the shared property lines of adjacent non-participating properties.
  - e. The drawings fail to distinguish the feature(s) referenced by the “Exist. Road R.O.W” markers.
  - f. It is not clear whether setbacks for public roads are measured from the edge of the right-of-way; if not, provide them.
6. (AFIP 7; AFIP 7.1(c); AFIP 7.2(a)(9)) – Provide versions of site plan figures and maps showing boundaries of participating and neighboring non-participating parcels – do so particularly where such boundaries would improve clarity, such as in Appendix 2, Exhibit A-1.1 Sheets 06-09.

### **Exhibit A-1.2 (Area Land Use Information)**

7. (AFIP 7.2(a)(7)) – Clarify whether there are any designated agricultural districts within the proposed facility and within 1000ft of the proposed facility; if so, display them on Exhibit A-1.2 maps.
8. (AFIP 7.2(a)(8)) – Provide a map in Exhibit A-1.2 displaying forest lands within the proposed facility and within 1000ft of the proposed facility.
9. (AFIP 7.2(a)(8)) – Clarify whether there are major communication infrastructure within the proposed facility and within 1000ft of the proposed facility; if so, display them on Exhibit A-1.2 maps.

### **Exhibit A-1.3 (Explanatory Information)**

10. (AFIP 7.3(a)) – Provide a description of the socioeconomic and demographic profiles of the project area and the portion of the community where the project will be sited.
11. (AFIP 7.3(a)) – Provide a description of the major industries in the project area and the portion of the community where the project will be sited.
12. (AFIP 7.3(a)(1)(iii)) – Provide justification for how the proposed project location, layout, construction methods, planned screening, etc. minimize visual impacts of the project on adjacent landowners and the broader communities containing the project. This may include identifying any visual impact or aesthetic requirements in the zoning ordinances of each affected local unit and explaining how the project design meets or exceeds those standards, or justification for not doing so.
13. (AFIP 7.3(a)(5)) – Describe the plan to meet or exceed pollinator standards as established by the Pollinator Habitat Planning Scorecard by achieving a score of 76 or higher, for example by providing the filled-out version of the Scorecard for the project and associated explanation. As part of the description for meeting or exceeding pollinator standards throughout the *lifetime* of the proposed facility, provide the maintenance plan for the vegetation and note if it is compatible with the identified seed mix(es) to be installed.
14. (AFIP 7.3(a)(6)) – Provide electrical design details describing how metal fences surrounding substations or other energized equipment will be grounded and bonded in compliance with the National Electric Code (e.g., NEC 2023 Article 250.190). This description may be supported by illustrations of typical grounding details (e.g., grounding rods, bonding jumpers, conductor sizes).

### **Exhibit A-1.4 (Construction Information)**

15. (AFIP 7.4(a)(1)) – Describe the project’s soil surveying and testing plans, pursuant to NREPA. This may include, but is not limited to:
  - a. Soil surveying and testing required for permitting, such as Soil Erosion and Sedimentation Control permitting under Part 91 of NREPA;
  - b. Soil surveying and testing conducted during environmental site assessments to verify compliance applicable provisions of NREPA, such as a baseline environmental assessment; and,

- c. Soil surveying and testing used to inform the project's proposed construction and installation methods.

16. (AFIP 7.4(a)(2)) – Provide the project's proposed methods for grading and excavation.

#### **Exhibit A-1.5 (Alternatives)**

17. (AFIP 7.5(a)) – Provide a map and description of each alternative site location, proposed site layout, or other alternative that was considered for the proposed project but was not ultimately selected for development, and provide rationale for why each such alternative was not selected.

#### **Exhibit A-1.6 (Changes)**

18. (AFIP 7.6(a)) – The application must include a map and description of each potential modification or variation to the proposed site plan being considered at the time of filing and that will be finalized prior to construction. A description may include conditions that would trigger the change, and when those conditions would be known and the ultimate decision made.
19. (AFIP 7.6(a)) – Provide maps depicting the changes described in Appendix 2, Exhibit A-1.6 Changes #1, 3, 4A, 4C, and 8. For each other change fitting within the categories presented in Appendix 1, Exhibit A-1.6, provide a map and description.

#### **Exhibit A-1.9 (Emergency Response Plan)**

20. (AFIP 7.9(a)) – Exhibit A-1.9 should include the entirety of the Emergency Response Plan (ERP). As submitted, multiple required items are contained elsewhere in the application (such as within Appendix 1, Exhibit A-1.9), but not within the ERP itself (Appendix 2, Exhibit A-1.9). Provide an ERP which includes all information required under AFIP 7.9. In particular, provide an ERP which includes the following omitted items:
  - a. (AFIP 7.9(a)(1)) – Evidence of consultation, or a good-faith effort to consult with, local first responders and county emergency managers. Evidence of a good-faith effort to consult with local first responders could include a description of the efforts that were made to initiate consultation. Evidence of consultation could include meeting dates, attendees, and any noteworthy outcomes or revisions to the ERP as a result of such consultation.
  - b. (AFIP 7.9(a)(2)) – A full list of contingencies (excluding fire) that would constitute a safety or security emergency, including but not limited to, the following items which are discussed elsewhere in the application:
    - i. Specific types of severe weather events.
    - ii. Personnel (or visitor) health emergencies or injuries.
    - iii. Cyber security emergencies.
    - iv. Capacity or transmission emergencies.

- v. Any additional specific contingencies currently not within the ERP.
- c. (AFIP 7.9(a)(3)) – Specific emergency response measures by contingency, which may include a more complete description of “robust emergency response protocols” (as described in the ERP) for each contingency.
- d. (AFIP 7.9(a)(4)) – Evacuation control measures for each contingency. If any aspects of evacuation measures will be determined at a later point, provide detail for when and how these measures will be determined.
- e. (AFIP 7.9(a)(5)) – Community notification procedures for each contingency.
- f. (AFIP 7.9(a)(6)) – Clear identification (for example, on a basic map) of the primary approach and departure routes for emergency vehicles, entrance locations, and primary access roads for the project. The ERP notes that access roads will be 12-foot wide, while other application materials note 14-foot access roads; this discrepancy should be clarified.

**Exhibit A-1.10 (Fire Response Plan)**

- 21. (AFIP 7.10(a)) – Exhibit A-1.10 should include the entirety of the Fire Response Plan (FRP). As submitted, multiple required items are contained elsewhere in the application (such as within Appendix 1, Exhibit A-1.10), but not within the FRP itself (Appendix 2, Exhibit A-1.10). Provide an FRP which includes all of the information required under AFIP 7.10. In particular, provide an FRP which includes the following omitted items:
  - a. (AFIP 7.10(a)(1)) – Evidence of consultation, or a good faith effort to consult with local fire department representatives, or, in the alternative, the State Fire Marshall or other local emergency manager. Evidence of a good-faith effort to consult with local first responders could include a description of the efforts that were made to initiate consultation. Evidence of consultation could include meeting dates, attendees, and any noteworthy outcomes or revisions to the FRP as a result of such consultation.
  - b. (AFIP 7.10(a)(2)) – Detail regarding the on-site equipment and systems to be provided or to prevent or handle fire emergencies. This description should include equipment and systems in the O&M building, and any other equipment or systems that will be utilized in on-site project areas other than the O&M building.

**Exhibit A-1.14 (Unanticipated Discoveries Plan)**

- 22. (AFIP 7.14(a)) – Provide anticipated impacts and plans to mitigate impacts to the environment and natural resources, including evidence of all environmental impact assessments referenced on page 2 of Application Appendix 2, Exhibit A-1.14. The applicant may choose to include this additional information in Exhibit A-6.2 and provide reference in Exhibit A-1.14.

**Exhibit A-1.16 (Complaint Resolution Process)**

23. (AFIP 7.16(a)(5)) – Within the Complaint Resolution Process, provide procedures for regular reporting of each complaint, and how *each* complaint was resolved.

**Exhibit A-2 (Project Description)**

24. (AFIP 6.3.2(a)(2)(iii)) – Regarding Appendix 2 Exhibit A-2. The AFIP indicates that the applicant is to indicate “The percentage of land within the township, city, or village dedicated to energy generation at the time of the application” and “the percentage of land within the county dedicated to energy generation at the time of the application.” The applicant indicates that the land associated with energy production is unknown, however the applicant also indicates the known presence of energy generation, e.g. a solar energy project located on 155 acres in Leslie Township. Provide the estimated percentage of land within the townships and county dedicated to energy generation based on publicly-available data and any other data available to the applicant. The estimate should include the percentage of land dedicated to energy production from the Blue Elk Solar project(s), as well as natural gas and petroleum facilities identified by the applicant in the north part of Ingham County. Publicly-available data sources may include the MPSC GIS hub to find current solar and wind facilities located within each township and within Ingham County.

**Exhibit A-4.2 (Local and Community Outreach)**

25. (AFIP 6.3.4(a)(2)(i)) – Provide a summary of outreach conducted to community groups, environmental organizations, and labor union representatives. For each interaction, provide at a minimum the date and time the outreach took place, who participated in the consultation, and a summary of findings, which may include any follow-up actions that were identified.

**Exhibit A-4.4 (Agency Consultations)**

26. (AFIP 6.3.4(a)(4)) – Regarding Application Appendix 2, Exhibit A-4.4, include each item designated by the AFIP for all consultations. Regarding each necessary permit, provide the timeline associated with securing that permit (“associated timeline”), including any permitting requirements and next steps to meet the requirements of the agency and any applicable laws. Required information is not limited to the period prior to construction. Staff was able to identify the following items as missing; if they were not provided, indicate as such.
- a. MDNR (Wildlife Division) – next steps and associated timeline.
  - b. EGLE – Time of consultation on February 26, 2025, next steps, and associated timeline.
  - c. County Road – Time of consultation on May 12, 2025, and associated timeline.
  - d. SHPO – next steps and associated timeline.
  - e. MDARD – associated timeline.
  - f. County Emergency Management – associated timeline.

- g. Consumers Energy – associated timeline.

**Exhibit A-6.2 (Environmental Compliance)**

27. (PA 233 Sec. 225(1)(f); AFIP 6.3.6(a)(2)) – In Application Appendix 1, Project Narrative on Exhibit A-6.2, the applicant states that it “will conduct comprehensive environmental assessments prior to construction to identify the expected direct impacts” of the facility. However, the application itself must include the “expected direct impacts” of the facility. Provide a complete and exhaustive environmental assessment – titled “Environmental Compliance Report” – which includes all expected direct impacts to the environment and natural resources, with comprehensive supporting evidence specific to the proposed project area. To the extent alternative project areas were also assessed based on expected direct impacts to environmental and natural resources, that information could also be presented in a similar Report.
28. (PA 233 Sec. 225(1)(f) and 225(1)(i); AFIP 6.3.6(a)(2); 6.3.6(a)(3)) – Within the Environmental Compliance Report, provide specific avoidance and/or mitigation strategies proposed based on the expected direct impacts of the project. Further, provide reasonable evidence to demonstrate that the proposed facility will comply with all applicable laws prior to commercial operation date. Such evidence may include identifying applicable laws and permits, and providing a plan for required avoidance and/or mitigation strategies.
29. (PA 233 Sec. 225(1)(i); MCL 324.1705(2); AFIP 6.3.6(a)(2)) – Within the Environmental Compliance Report, describe how the proposed project complies with the Michigan Environmental Protection Act, MCL 324.1705(2). This description should address the following items, and may also include identification of environmental impacts that also involve separate permitting decisions under the purview of other regulatory agencies.
- a. The alleged pollution, impairment, or destruction of natural resources or the public trust in these resources, with supporting evidence; and,
  - b. Feasible and prudent alternatives consistent with the reasonable requirements of the public health, safety, and welfare. The results of the “site suitability tool” referenced on p18 of the Application Project Narrative, but not provided in the application, could be a part of such an assessment.
30. (PA 233 Sec. 225(1)(f) and 225(1)(i); AFIP 6.3.6(a)(2)) – In Appendix 2 Exhibit A-1.5 Alternative #3, the applicant states that a parcel was added in Onondaga Township to “ensure the project’s viability and optimize power generation”, while “requir[ing] minimal additional impacts”. Regarding this parcel: provide the expected direct impacts on the environment and natural resources and how the applicant intends to address and mitigate these impacts. Impacts appear to include, but may not be limited to, those resulting from the additional tree clearing and development adjacent to a waterbody.
31. (PA 233 Sec. 225(1)(f) and 225(1)(i) and 226(7)(c); AFIP 6.3.6(a)(2)) – Within the Environmental Compliance Report, provide the expected direct impacts of the proposed energy facility on wetlands and waterways (including waterbodies and watercourses); a

plan describing how these impacts are proposed to be addressed and/or mitigated; and a statement and reasonable evidence that the proposed facility will not begin commercial operation until it complies with applicable state and federal law. Such content may include detailed maps and reports of wetlands, waterbodies, and watercourse assessments, and delineation methodology utilized for proposed project area and 1000-ft perimeter.

32. (PA 233 Sec. 225(1)(f) and 225(1)(i); AFIP 6.3.6(a)(ii)) – Project MNFI results include a record of the Blanding’s turtle, which appears under Michigan DNR Fisheries Order 224.25. Describe expected direct impacts to this species and a plan describing how these impacts are proposed to be addressed and/or mitigated, with reasonable evidence to support compliance with law.
33. (PA 233 Sec. 225(1)(f) and 225(1)(i); AFIP 6.3.6(a)(2)(i)) – Application Appendix 2, Exhibit A-6.2 indicates that the formal consultation process with SHPO has not yet been initiated by way of application submission, and that an archaeological assessment and architectural historical survey have not begun or are incomplete. Provide the expected direct impacts of the proposed energy facility on cultural and historical resources, including sites; a plan describing how these impacts are proposed to be addressed and/or mitigated; and reasonable evidence that the proposed facility will not begin commercial operation until it complies with applicable state and federal law. A description of the expected direct impacts could include a desktop survey of cultural and historical resources within the project area and an appropriate buffer; and the plan to address and mitigate impacts / reasonable evidence for compliance with law may include a description of the applicant’s plan and timeline for completing required field surveying. Each should be conducted in consultation with SHPO, or provide a justification for any consultation the applicant deemed not necessary.
34. (PA 233 Sec. 225(1)(f); AFIP 6.3.6(a)(2)(i); 7.2(a)(8)) – Provide information regarding the presence of wildlife corridors within the proposed project area and within 1000ft of the project area. For areas identified, indicate the expected direct impacts of the proposed project and impact mitigation strategies.
35. (PA 233 Sec. 225(1)(i); AFIP 6.3.6(a)(2)(ii)) – Regarding materials management and pollution prevention, provide evidence that the proposed facility will comply with Part 5 rules of Part 31 of NREPA (Mich Admin Code R 324.2001, *et seq.*).

#### **Exhibit A-6.4 (Stormwater Mitigation Plan)**

36. (AFIP 6.3.6(a)(4)(i)) – Incorporate a plan to minimize, mitigate, and repair (MMR) drainage impacts into the Stormwater Mitigation Plan.
37. (AFIP 6.3.6(a)(4)(ii); AFIP 6.3.4(a)(4)) – Regarding Application Appendix 2, Exhibit A-6.4, submitted materials include itemized guidance from the Ingham County Drain Commissioner (ICDC) issued in a February 3, 2025 meeting and through correspondence on March 25, 2025, as well as referenced guidance from a February 20, 2025 meeting with the ICDC (Application Appendix 2, Exhibit A-4.4). Address all guidance from

consultation with the ICDC in the Stormwater Mitigation Plan, or MMR upon its inclusion into the Stormwater Mitigation Plan. Further, include agency consultation details, including date and time the consultation took place, who participated in the consultation, and copies of correspondence listing necessary permits, next steps, and associated timeline for each consultation. This may be satisfied by reference to Exhibit A-4.4, so long as such information is provided in that exhibit. Upon incorporation, address the following:

- a. (AFIP 6.3.4(a)(4); 6.3.6(a)(4)(ii)) Provide a comprehensive documentation of consultation with the ICDC, including all meeting minutes or summaries, guidance from the ICDC, and referenced email attachments. Clearly indicate what correspondence each attachment is associated with. Staff was able to identify the following items as missing:
  - i. The referenced attachment in a February 6, 2025 email correspondence from the ICDC. Based on a February 7, 2025 response from Atwell, this letter contained review and response of the concept plan and meeting notes.
  - ii. The referenced attachment in a February 14, 2025 email from Atwell.
  - iii. The referenced attachment in a February 20, 2025 email from PEA Group.
  - iv. The guidance received from the ICDC in a February 20, 2025 meeting.
  - v. Details of the February 20, 2025 meeting, such as meeting minutes.
  - vi. All referenced attachments from a February 28, 2025 email from Atwell.
  - vii. The referenced attachment from an April 8, 2025 email from Ranger Power or verify if it is the Project Memorandum included in Exhibit A-4.4 with Subject "Panels as impervious surface".
  - viii. The document(s) referenced by the ICDC in a May 12, 2025 email from SFMatta@lan-inc.com.
- b. Provide the date and time for all meetings. Staff have identified at least the following as missing:
  - i. The time of the February 3, 2025 meeting.
  - ii. The date and time of the consultation referenced in the Project Memorandum with Subject "Panels as impervious surface".
- c. Identify the names of the participants for each consultation. Staff has identified at least the February 20, 2025 consultation list as missing.
- d. List necessary permits, next steps, and associated timeline to complete those steps for each consultation.

**Exhibit A-8.3 (Host Community/Community Benefit Agreements)**

38. (AFIP 6.3.8(a)(3)(i)) – Provide signed copies of Host Community Agreements (HCAs) and/or Community Benefits Agreements (CBAs).
- a. In the event that HCAs have been proposed but not signed, provide proof of submittal of the proposed HCA to each Affected Local Unit showing the date and time the proposed HCA was sent to each ALU.
  - b. Provide or identify the payment provision within each HCA that specifies the exact monetary amount to be dispensed to each ALU, based upon the nameplate capacity located within that ALU. The nameplate capacity and dollar amount specific to the ALU should be specified within that ALU’s (proposed or signed) HCA.

**Exhibit A-8.4: (Local Job Creation)**

39. (AFIP 6.3.8(a)(4); AFIP 6.3.14(a) and Attachment F(20)) – Provide a Project Labor Agreement (PLA), or collective bargaining agreement, for the proposed project, as applicable. Further, provide a proposal for how the applicant will meet Proposed Minimum Condition 20, or provide a justification for why the condition should not be applied to the facility. Meeting that condition requires utilizing a “Project Labor Agreement” as the term is defined under PA 233 Sec. 221(u). If such a proposal is provided, address how the PLA will comply with each term of 221(u).

**Exhibit A-9 (Farmland Protection)**

40. (AFIP 6.3.9; AFIP 6.3.9(b)(3-5)) – Using publicly-available data, such as <https://croplandcros.scinet.usda.gov/> or the most recent National Land Cover Dataset, calculate the total number of acres of farmland within each of Leslie, Onondaga, and Vevay Townships. Using those or other tools, such as the National Resource Conservation Service’s Web Soil Survey tool, calculate the total acreage of farmland in each township differentiated by type. Use the resulting values to complete the requirements of AFIP 6.3.9.

**Exhibit A-13.1 through 13.3 (Decommissioning)**

41. (AFIP 6.3.13(1)(iii)) – In Appendix I, Exhibit A-13.1, the applicant states “Appendix 2, Exhibit A-13.1 ...[ ]... includes a facility overview, expected useful life, triggers for decommissioning, and soil analysis to ensure post-decommissioning soil quality.” Appendix 2, Exhibit A-13.1 does not include any description of events which would trigger applicant-initiated decommissioning. Provide a description of events which would trigger applicant-initiated decommissioning.
42. (AFIP 6.3.13(1)(iv)) requires that the decommissioning plan contain “[a] physical and chemical analysis of the soil which can be used to ensure soil is returned to a useful condition.” In Appendix 2, Exhibit A-13.1, the applicant states “According to the USDA Web Soil Survey, the physical and chemical analysis of soils within the project area indicates predominantly loam and sandy loam textures with pH values ranging from mildly acidic (6.0) to neutral (7.0), conducive to various agricultural and ecological

uses.” Explain how the analysis provides sufficient details to “ensure post-decommissioning soil quality”, or supplement it as appropriate.

43. (AFIP 6.3.13(2)(i)) – Provide a proposed decommissioning schedule within the applicant’s decommissioning plan.
44. (AFIP 6.3.13(5)(i)) – Provide details regarding the type and manner of financial assurance the developer plans to provide within the applicant’s decommissioning plan.

**Exhibit 14 – (Conditions)**

45. (AFIP 6.3.14(a) and Attachment F(2)) - Preconstruction Meeting  
The proposed condition does not confirm that the applicant will agree to file the final drawings, plans, and permits received into the case docket prior to the start of construction. Provide a condition which includes this agreement, or explain why this condition should not be applied to the facilities.
46. (AFIP 6.3.14(a) and Attachment F(10)) - Post Construction Sound Report  
Confirm that the applicant agrees to file post-construction sound measurements in accordance with MPSC Sound guidance into the case docket or explain why this condition should not be applied to the facilities. Confirm that the post-construction sound measurements will comply with AFIP Attachment D-4.2, and will accordingly be filed to the case docket within 60 days of measurements, or explain why this condition should not be applied to the facilities.
47. (AFIP 6.3.14(a) and Attachment F(16)) - Decommission Agreement  
The applicant’s narrative discusses the terms of its decommissioning agreement, but regarding Condition 16, does not provide sufficient further information. Provide a proposal to execute a decommissioning agreement approved by the Commission, including a commitment to execute the decommissioning agreement, or explain why this condition should not be applied to the facilities.