

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

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

APPLICATION

Acceleration Solar, LLC (“Acceleration Solar”) respectfully requests that the Michigan Public Service Commission (“MPSC” or the “Commission”) approve its Application for a Renewable Energy or Storage Siting Certificate (the “Application”). Acceleration Solar submitted its first Application to the MPSC on June 18, 2025. Thereafter, on August 1, 2025, the Commission issued an Incompleteness Memo. Consistent with same, and following numerous meetings with Commission Staff, Acceleration Solar hereby submits its revised Application. In support of its revised Application, Acceleration Solar states as follows:

I. INTRODUCTION

1. Acceleration Solar submits this Application for Solar Energy Facilities for the Acceleration Solar Project (the “Project”).
2. The Project is proposed for development by Ranger Power, LLC (“Ranger Power”).
3. Ranger Power is a utility-scale renewable energy development company focused on delivering cost-effective, clean renewable energy projects across the United States.
4. Ranger Power’s team of experienced developers and renewable energy specialists have successfully developed early-, mid-, and late-stage solar projects throughout the country.

5. Since 2017, Ranger has permitted more than 3,600 megawatts (“MW”) and executed over 3,600 MW of utility-scale Power Purchase and Build-Own-Transfer agreements with leading power providers throughout the region.

6. Over 2,000 MW of solar projects developed by Ranger have moved into construction, 960 MW of which are now commercially operating. The Ranger Power team has approximately 10 gigawatts (“GW”) under development. By the end of 2026, over 1,500 MW of projects developed by Ranger Power will be in commercial operation.

II. PROJECT OVERVIEW

7. Acceleration Solar has made a comprehensive and diligent effort in designing and siting a facility that meets or exceeds the requirements and standards for approval for Solar Energy Facilities set forth in Public Act 233 of 2023 (PA 233), as implemented by the MPSC, and to meet all statutory and regulatory requirements in connection with same.

8. Acceleration Solar has acquired the rights to develop, construct, and operate an up to 90-MW alternating current solar project within ten parcels of land owned by four private landowners. These land rights are granted by easement agreements or by purchase option agreement.

9. The Project, which exceeds the 50-MW size threshold, is a proposed approximately 90-MW, alternating current solar energy generating facility in Vevay Township, Leslie Township, and Onondaga Township within Ingham County, Michigan.

10. The Project will utilize approximately 618 acres of fenced-in area located on approximately 873 acres of participating land (the “Project Area”) within Leslie, Vevay, and Onondaga townships, Ingham County, Michigan.

11. The Project will consist of solar panels and inverters arranged in photovoltaic (“PV”) arrays. Associated facilities and infrastructure include the Project substation, operations

and maintenance building, gen-tie to point-of-interconnection, underground electrical cables (collection) to the Project substation, perimeter fencing, landscape screening, stormwater basins, and gravel access roads to each PV array and Project substation.

12. Construction is expected to begin in 2027, with commercial operation anticipated in 2028. Exact construction and operation dates are dependent on receipt of necessary permits, equipment, and approvals.

13. The Project Area was selected based on land use, interest from landowners, proximity to existing electrical grid infrastructure, and proximity to large energy load centers throughout Michigan.

14. As sited, the Project optimizes efficient use of land to generate solar power, while avoiding impacts to natural resources or existing land uses. Additionally, as designed, the Project avoids impacts to wetlands, streams, and floodplains to the greatest extent practicable.

15. Acceleration Solar anticipates that the Project will benefit the local community through the creation of local jobs, tax revenue benefits, and energy needs contributions.

16. While Ranger Power is the developer of the Project, Acceleration Solar is expected to own the Project.

III. NARRATIVE, EXHIBITS, TESTIMONY, AND RESERVATION OF RIGHT TO AMEND

17. Concurrently with the filing of this Application, Acceleration Solar is filing a detailed Solar Energy Facility Siting Certification Narrative describing the Project in full (**Appendix 1**), supporting exhibits (**Appendix 2**), and written direct testimony (**Appendix 3**) in support of its Application. Reference to this material will provide additional details regarding the proposal and relief being sought. The relief described in the narrative, exhibits, and direct testimony should be considered as if specifically requested in this Application.

18. Acceleration Solar reserves the right to revise, amend, or otherwise change the relief it is requesting in any way appropriate depending upon the duration and progress of hearings in this proceeding, the issuance of orders that have an impact upon this case, or the occurrence of other material events.

IV. REQUESTED RELIEF

WHEREFORE, Acceleration Solar respectfully requests that the Michigan Public Service Commission approve the Application and grant Acceleration Solar a Renewable Energy or Storage Siting Certificate consistent with the Project.

Dated: October 3, 2025

Respectfully submitted,

ACCELERATION SOLAR, LLC

/s/ Adam Cohen

Adam Cohen, President
Acceleration Solar, LLC

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Attorneys for Acceleration Solar, LLC

VERIFICATION

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Adam Cohen, being first duly sworn, deposes and says that he is the President of Acceleration Solar, LLC, a Delaware limited liability company; that he is duly authorized to and has executed the foregoing Application for and on behalf of Acceleration Solar, LLC; that he has read the same and knows the contents thereof, and that the same is true to the best of his knowledge and belief.

ID: 1758901256057

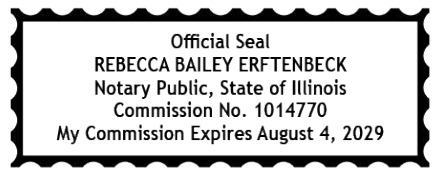
By: Adam Cohen
Adam Cohen

Sworn to and subscribed before me on this the 26 day of September, 2025.

Rebecca Bailey Ertfenbeck

Notary Public

My Commission expires: August 4, 2029



This notarial act was an online notarization using audio-video technology.

STATE OF MICHIGAN
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* * * * *

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ATTACHMENTS

1. Appendix 1 – Solar Energy Facility Siting Certification Narrative
2. Appendix 2 – Supporting Exhibits
3. Appendix 3 – Direct Testimony

ACCELERATION SOLAR, LLC

APPENDIX 1

NARRATIVE

Submittal Date:
October 03, 2025

Acceleration Solar Project

Solar Energy Facility Siting Certification Application

Prepared for:
Michigan Public Service Commission (MPSC)

Prepared by:
Atwell, LLC
Two Towne Square
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TABLE OF CONTENTS

I. PROJECT INTRODUCTION..... 4

II. EXHIBITS A-1.1 THROUGH A-1.16: SITE PLAN 5

III. EXHIBIT A-2: PROJECT DESCRIPTION..... 37

IV. EXHIBIT A-3: PROJECT SCHEDULE..... 40

V. EXHIBIT A-4.1 THROUGH A-4.5: LOCAL OUTREACH 41

VI. EXHIBIT A-5: NFPA COMPLIANCE (FACILITIES WITH ENERGY STORAGE ONLY)..... 44

VII. EXHIBIT A-6.1 THROUGH A-6.4: ENVIRONMENTAL COMPLIANCE 45

VIII. EXHIBIT A-7: SIGNAL MITIGATION PLAN 48

IX. EXHIBIT A-8.1 THROUGH A-8.5: PUBLIC BENEFITS..... 48

X. EXHIBIT A-9: FARMLAND PROTECTION..... 51

XI. EXHIBIT A-10: PUBLIC HEALTH AND SAFETY 53

XII. EXHIBIT A-11: DARK SKIES (SOLAR AND/OR STORAGE FACILITIES ONLY) 55

XIII. EXHIBIT A-12: TRANSMISSION AND INTERCONNECTION AGREEMENTS 55

XIV. EXHIBIT A-13.1 THROUGH A-13.3: DECOMMISSIONING 55

XV. EXHIBIT A-14: CONDITIONS..... 58

XVI. EXHIBIT A-15: OTHER REQUESTED INFORMATION 58

XVII. EXHIBIT A-16: APPLICATION CHECKLIST 59

XVIII. CONCLUSION 59

SUPPORTING EXHIBITS – SEE APPENDIX 2

- EXHIBIT A-1.1: PLANNED FACILITIES (SITE PLAN)**
- EXHIBIT A-1.2: AREA LAND USE INFORMATION**
- EXHIBIT A-1.3: EXPLANATORY INFORMATION AND ASSOCIATED APPENDICES**
- EXHIBIT A-1.4: CONSTRUCTION INFORMATION**
- EXHIBIT A-1.5: ALTERNATIVES**
- EXHIBIT A-1.6: CHANGES**
- EXHIBIT A-1.7: SOUND REPORT AND MONITORING PROTOCOL (PRE-CONSTRUCTION NOISE ANALYSIS)**
- EXHIBIT A-1.8: SHADOW FLICKER REPORT FOR WIND FACILITIES**
- EXHIBIT A-1.9: EMERGENCY RESPONSE PLAN**
- EXHIBIT A-1.10: FIRE RESPONSE PLAN**
- EXHIBIT A-1.11: COMMISSIONING PLAN**
- EXHIBIT A-1.12: EMERGENCY OPERATION PLAN**
- EXHIBIT A-1.13: HAZARD MITIGATION ANALYSIS**
- EXHIBIT A-1.14: UNANTICIPATED DISCOVERIES PLAN**
- EXHIBIT A-1.15: PARTICIPATING PARCEL LIST**
- EXHIBIT A-1.16: COMPLAINT RESOLUTION PROCESS**
- EXHIBIT A-2: PROJECT DESCRIPTION**
- EXHIBIT A-3: PROJECT SCHEDULE**
- EXHIBIT A-4.1: CHIEF ELECTED OFFICIAL**
- EXHIBIT A-4.2: SUMMARY OF COMMUNITY OUTREACH AND EDUCATION EFFORTS**
- EXHIBIT A-4.3: ACCOMMODATIONS OR CHANGES**
- EXHIBIT A-4.4: SUMMARY OF AGENCY CONSULTATIONS**
- EXHIBIT A-4.5: SUMMARY OF TRIBAL ENGAGEMENT**
- EXHIBIT A-5: NFPA STATIONARY ENERGY STORAGE SYSTEM COMPLIANCE**
- EXHIBIT A-6.1: SOIL AND ECONOMIC SURVEY REPORT**
- EXHIBIT A-6.2: ENVIRONMENTAL COMPLIANCE REPORT**
- EXHIBIT A-6.3: PERMIT LIST AND STATUS**
- EXHIBIT A-6.4: STORMWATER MITIGATION PLAN (PRELIMINARY STORMWATER MANAGEMENT PLAN)**
- EXHIBIT A-7: SIGNAL MITIGATION PLAN**
- EXHIBIT A-8.1: TAX REVENUE (TAX REVENUE MEMORANDUM)**
- EXHIBIT A-8.2: PAYMENTS TO LANDOWNERS**
- EXHIBIT A-8.3: HOST COMMUNITY AND COMMUNITY BENEFITS AGREEMENTS**
- EXHIBIT A-8.4: LOCAL JOB CREATION**
- EXHIBIT A-8.5: ENERGY NEEDS CONTRIBUTIONS**
- EXHIBIT A-9: FARMLAND PROTECTION**
- EXHIBIT A-10: PUBLIC HEALTH AND SAFETY**
- EXHIBIT A-11: DARK SKIES (DARK SKIES LIGHTING PLAN)**
- EXHIBIT A-12: TRANSMISSION AND INTERCONNECTION AGREEMENTS**
- EXHIBIT A-13.1: DECOMMISSIONING PLAN (DECOMMISSIONING PLAN AND ESTIMATE)**
- EXHIBIT A-13.2: DETAILED DECOMMISSIONING COST ESTIMATE**
- EXHIBIT A-13.3: PROPOSED DECOMMISSIONING AGREEMENT**
- EXHIBIT A-14: CONDITIONS**
- EXHIBIT A-15: OTHER REQUESTED INFORMATION**
- EXHIBIT A-16: APPLICATION CHECKLIST**

TESTIMONIAL EXHIBITS – SEE APPENDIX 3

EXHIBIT B-1: DIRECT TESTIMONY OF SEAN HARRIS

EXHIBIT B-2: DIRECT TESTIMONY OF ERNEST SCHENK

EXHIBIT B-3: DIRECT TESTIMONY OF AILEEN KENNEY

EXHIBIT B-4: DIRECT TESTIMONY OF CRAIG KANTOLA

EXHIBIT B-5: DIRECT TESTIMONY OF JUSTIN BOWERS

I. PROJECT INTRODUCTION

On behalf of Acceleration Solar, LLC (Acceleration Solar, or the Applicant), Atwell, LLC (Atwell) has prepared this Application for a Michigan Public Service Commission (MPSC) Certificate for Solar Energy Facilities for the Acceleration Solar Project (the Project) which exceeds the 50 megawatts (MW) size threshold. The Project is proposed for development by Ranger Power, LLC (Ranger Power, or Ranger).

Ranger Power is a utility-scale renewable energy development company headquartered in Chicago, Illinois, focused on bringing well-sited, community-supported solar energy to states in the Midwest. Ranger Power has a development portfolio of approximately 10 GW of active projects ranging in nameplate capacity from 50 MW to 400 MW. Since 2017, Ranger has permitted more than 3,600 MW and executed over 3,600 MW of utility-scale Power Purchase and Build-Own-Transfer agreements with leading power providers throughout the region. This represents some of the largest volumes of solar development in the Midwest. Over 2,000 MW of solar projects developed by Ranger have moved into construction, 960 MW of which are now commercially operating--many of these projects represent the largest solar projects operating in their respective states.

By the end of 2026, Ranger anticipates that over 1,500 MW of projects developed by Ranger Power will be in commercial operation, delivering on its sustained value and trust to its partners. Ranger is led by one of the most experienced teams in the renewable energy space. Their time-tested approach to development involves working closely with landowners and communities to gain their support when bringing new investment and clean energy to the region. Ranger Power is an industry leader because of the commitment to work closely with communities to ensure projects are a win-win. Ranger Power projects represent a significant investment and a new clean energy resource that benefits landowners, business owners, and stakeholders through bringing new investment, increased tax base, and employment opportunities.

The Acceleration Solar Project will include up to a nameplate capacity of 90 MW of photovoltaic solar panels located within Vevay, Leslie, and Onondaga townships, Ingham County, Michigan. There are ten participating parcels owned by four private landowners included in the Project, totaling approximately 873 acres (hereafter referred to as the Project Area). Of this, solar panels have been sited within a fenced-in area of approximately 618 acres. Approximately 9% (8 MW) of the proposed 90MW is included in Onondaga Township, approximately 39% (35MW) is included in Vevay Township, and approximately 52% (47 MW) is included in Leslie Township. Approximately 59 of the fenced-in acres are in Onondaga Township, approximately 240 of the fenced-in acres are in Vevay Township, and approximately 318 of the fenced-in acres are in Leslie Township. One of the ten participating parcels only contains proposed underground collection line and will not contain panels. One parcel only contains the proposed overhead transmission line (gen-tie) and the Project point of interconnection (POI). One parcel included in the Project Area does not have any proposed infrastructure at this time. Land use within the Project Area is primarily agriculture and undeveloped woodlots. The Project Area was selected based on land use, interest from landowners, proximity to existing electrical grid infrastructure, and proximity to large energy load centers throughout Michigan.

The Project will consist of solar panels and inverters arranged in photovoltaic (PV) arrays. Associated facilities and infrastructure include the Project substation, operations and maintenance building (O&M), gen-tie to point-of-interconnection (POI), underground electrical cables (collection) to the Project substation, perimeter fencing, landscape screening, stormwater basins, and gravel access roads to each PV array and Project substation. The proposed locations of the solar arrays, inverters, collection lines, access roads, fencing, and other Project infrastructure are shown in the Site Plan in **Appendix 2, Exhibit A-1.1**.

As demonstrated throughout this Application narrative, Acceleration Solar made a comprehensive and diligent effort in designing and siting a facility that meets or exceeds the requirements and standards for approval for Solar Energy Facilities set forth in Public Act 233 of 2023 (PA 233), as implemented by the Michigan Public Service Commission (MPSC). As sited, the Project optimizes efficient use of land to generate solar power, while avoiding impacts to natural resources or existing land uses. Additionally, as designed, the Project avoids impacts to

wetlands, streams, and floodplains to the greatest extent practicable. The Applicant will attempt to work with non-participating landowners adjacent to the Project that do not already have sufficient natural vegetative screening or other obscuring structures that reasonably obscure the view of the Project to develop a landscaping plan prior to the commencement of construction. The Project plans to coordinate with stakeholders and township officials throughout Project permitting, construction, and operation.

Construction is expected to begin in 2027, with commercial operation anticipated in 2028. Exact construction and operation dates are dependent on receipt of necessary permits, equipment, and approvals. Acceleration Solar is proud to present a project that will be an asset to community members, local stakeholders, and job seekers alike.

II. EXHIBITS A-1.1 THROUGH A-1.16: SITE PLAN

Pursuant to Section 7 of the Application Filing Instructions and Procedures, all items provided for the purposes of this Application are clear and legible and Site Plans for this Application were prepared using the most recent edition of United States Geological Survey (USGS) maps and Geographical Information Systems (GIS) mapping. The Site Plan for the Project provides a comprehensive layout of the proposed facility and right-of-way extents, including essential features such as electric collection lines, inverters, transmission lines, interconnections, solar arrays, and secured areas. The Site Plan also includes ancillary features located on the facility site such as roads, railroads, switchyards, substations, and similar facilities. The Site Plan details the locations of both on-site and off-site utility interconnections as well as the areas designated for construction clearing and disturbance. Additionally, the Site Plan includes nearby significant institutions, parks, recreational areas, waterbodies, legal boundaries of surrounding municipalities, and occupied structures within 1,000 feet of the site. The proposed Project, right-of-way for the facility, participating properties, adjacent properties, and locations of deeded easements that exists within the footprint of the facility are included in the Site Plan. All existing site elements, such as public roads, known utilities, parcel boundaries, and known easements, are represented based on available spatial data, depicting the approximate locations of relevant components within the Project's footprint. Refer to the Site Plan in **Appendix 2, Exhibit A-1.1** of this Application.

For more information, see also **Appendix 3, Exhibit B-1**, Direct Testimony of Sean Harris ("S. Harris"), at pp. 4-8.

EXHIBIT A-1.1 – PLANNED FACILITIES

A-1.1.(a) – Site Plans must, at a minimum, depict the following information:

1. The proposed location of the facility and potential right-of-way extents, including proposed electric collection and transmission lines and interconnections, all fenced in or secured areas, as well as ancillary features located on the facility site such as roads, railroads, switchyards, energy generation, storage or regulation facilities, substations, and similar facilities.

Refer to Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1**.

2. The proposed location of any off-site utility interconnections that are available to the applicant at the time of application, including all electric transmission lines, communications lines, stormwater drainage lines, county and intercounty drains, and appurtenances thereto, to be installed connecting to and servicing the site of the facility.

Interconnection for the Project is located on parcel 33-10-10-31-300-002. Refer to Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1**.

3. The proposed limits of clearing and disturbance for construction of all facility components and ancillary features, including laydown yards and temporary staging or storage areas.

Proposed tree clearing areas and approximate limits of disturbance for the entire Project are displayed on the Site Plan. The Project's primary laydown yard is located adjacent to the Project substation on tax

parcel number 33-10-10-31-300-002. Refer to Proposed Conditions on Sheets 5-8 & 10-12 and Solar Details & Construction Information on Sheet 16 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

4. Major institutions, parks, and recreational areas within 1000 feet of the site.

Refer to Existing Conditions on Sheet 3 and Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

5. Lakes, reservoirs, streams, canals, rivers, wetlands, and other waterbodies within 1000 feet of the site.

Desktop and field investigations were completed in the summer of 2022 and fall of 2024 to identify, delineate, and characterize wetlands, assess streams, evaluate the presence of floodplains, and determine the likely regulatory status of the identified water resources. The full extent of all delineated wetlands and streams, including a stream in Onondaga Township, are displayed on the Site Plan. Refer to Existing Conditions on Sheet 3 and Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

6. Legal boundaries of cities, villages, townships, and counties within 1000 feet of the site.

Refer to Existing Conditions on Sheet 3 and Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

7. Occupied structures within 1000 feet of the site.

Occupied structures within 1,000 feet of the site are displayed as black boxes with a grey fill and yellow X on the Site Plan. Refer to Existing Conditions on Sheet 3 and Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

8. The location of inverters and other noise-emitting facilities showing the distance to occupied structures, property lines, and public rights-of-way.

Refer to Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

9. The area of the proposed site or right-of-way for the facility, and the identification of participating properties and adjacent properties.

Non-participating parcels adjacent to the Project include a black cross-hatch and “non-participating” label. Refer to Participating Parcel List on Sheet 2 and Proposed Conditions on Sheets 6-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

10. The location of any deeded easement known to date that exists within the footprint of the facility.

- i. **The existing Site Plan elements, including without limitation, project boundary(ies), parcel boundaries, public roads, railroads, public right-of-way, existing public utilities, and easement locations shall be shown as approximate locations based on readily available desktop/GIS/publicly available spatial data within the footprint of the facility.**

A site plan was prepared for the Project using the latest edition of USGS maps, GIS mapping, and preliminary ALTA surveys. The location and layout of Project infrastructure can be found within Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

The Site Plan for the Project provides a comprehensive layout of the proposed facility and right-of-way extents, including essential features such as electric collection lines, transmission lines, interconnections, and secured areas. The Site Plan also includes ancillary features located on the facility site such as roads, railroads, switchyard, energy generation, storage or regulation facilities, substation, and similar facilities. While the general locations of proposed switchyard and energy

storage are displayed on the plans, both facilities will be permitted and constructed as separate projects and will not be discussed further in this Application. The Site Plan details the locations of both on-site and off-site utility interconnections as well as the areas designated for construction clearing and disturbance. Additionally, the Site Plan includes nearby significant institutions, parks, recreational areas, waterbodies, legal boundaries of surrounding municipalities, and occupied structures within 1,000 feet of the site. The proposed Project Area, right-of-way for the facility, participating properties, adjacent properties, and locations of deeded easements that exists within the footprint of the facility are included in the Site Plan. All existing site elements, such as public roads, utilities, parcel boundaries, and easements, are represented based on available spatial data, depicting the approximate locations of relevant components within the Project's footprint.

A-1.1.(b) – An aerial photograph or a map using satellite imagery with depictions of planned facilities, fences, roads, occupied buildings, and planned screening, landscaping, and vegetative cover.

Aerial backgrounds are included on all sheets of the Site Plan which contain planned facilities. Refer to the Sheets 01 and 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

A-1.1.(c) – A dimensioned drawing or map with dimensions added showing setbacks from the project boundary and fences to all structures on participating properties, road rights-of-way, waterways, wetlands, occupied buildings and structures on nonparticipating properties, and property lines of non-participating properties.

The Site Plan for the proposed Project includes a dimensioned map showing setbacks from the Project boundary and fences to structures on participating properties, edge of road rights-of-way, waterways, wetlands, occupied structures on nonparticipating properties, and property lines of non-participating properties. In addition to distance measurements, setback areas are displayed with a grey fill. Refer to Proposed Setbacks on Sheet 4 and Proposed Conditions on Sheets 5-9 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

A-1.1.(d) – A description of the maximum height of solar panels, wind turbines, storage facilities, and associated electrical equipment in relation to existing overhead communication and electric transmission lines.

The Site Plan for the proposed Project includes a detailed description of the maximum height of the planned PV arrays and associated electrical equipment, ensuring compliance and compatibility with existing overhead communication and electric transmission lines. Panel heights at max tilt will not exceed 15 feet. Refer to Solar Details & Construction Information located on Sheet 16 of the Site Plan in **Appendix 2, Exhibit A-1.1.**

For more information regarding the Planned Facilities, see also **Appendix 3, Exhibit B-2**, Direct Testimony of Ernest Schenk ("E. Schenk"), at pp. 6-7.

EXHIBIT A-1.2 – AREA LAND USE INFORMATION

A-1.2.(a) – Exhibit A-2 maps must show, at a minimum, the following information within the proposed facility (including all components and ancillary feature(s)) and within 1,000 feet of the proposed facility (including all components and ancillary feature(s)). The applicant should ensure that all items provided are clear and legible which could entail providing some of the requested items on separate layers, separate portable document format (pdf) maps, or by showing some areas on another scale.

The area land use maps for the proposed Project include all required details within and surrounding the facility up to 1,000 feet, including all components and ancillary features. To enhance clarity and legibility, specific items have been provided on separate layers, individual PDF maps, or at varied scales where necessary. Refer to Figures 1-7 – Area Land Use Information in **Appendix 2, Exhibit A-1.2.**

- 1. Municipal boundaries and taxing jurisdictions, at a scale sufficient to determine and demonstrate relation of facilities to those geographic and political features.**

The Area Land Use Maps for the proposed Project include municipal boundaries and taxing jurisdictions at a scale sufficient to determine and demonstrate relation of facilities to geographic and political features. Refer to Figure 1 – Site Location Map in **Appendix 2, Exhibit A-1.2**, which contains a detailed legend showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas.

2. Proposed land uses within the facility and surrounding area including, but not limited to, the identification of land being utilized for agriculture including the cultivation of specialty crops according to publicly available data.

The area land use maps for the proposed Project include the planned land uses within the facility and surrounding area. This includes, but is not limited to, identification of agricultural land and the cultivation of specialty crops and identification of forested areas according to publicly available data. According to the 2021 USDA-CDLC data, the primary crops in production throughout the Project Area and adjacent parcels are corn and soybean, but also include winter wheat, speltz, and alfalfa. Currently, none of the land within the proposed Project Area is utilized for cultivating specialty crops. Additionally, forested areas within the proposed Project Area and buffer are minimal. Refer to Figure 3 – Land Use Map in **Appendix 2, Exhibit A-1.2**, which contains a detailed legend showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas. Crops rotate annually within the Project Area and are subject to change from the data represented on Figure 3.

3. Farmland, including, but not limited to, prime farmland within the facility and surrounding area within 1000 feet of the perimeter.

The area land use maps for the proposed Project identify existing farmland, including prime farmland within the facility and the surrounding area within 1,000 feet of the perimeter. Approximately 14.9% of the proposed Project area is designated as prime farmland, 82.4% as prime farmland if drained, and 2.64% as farmland of local importance. Approximately 21.8% of the land within 1,000 feet of the proposed Project boundary is designated as prime farmland, 3.76% as farmland of local importance, 74.2% as prime farmland if drained, and the remaining 0.13% is not designated as prime farmland. Refer to Figure 4 – Prime Farmland Map in **Appendix 2, Exhibit A-1.2**, which contains a detailed legend showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas.

4. Existing overhead and underground major facilities for electric, gas, and telecommunications transmission.

The area land use maps for the proposed Project identify existing overhead and underground major facilities for electric, gas, and transmission. Identified facilities within and directly adjacent to the Project Area include a transmission corridor and natural gas pipelines. No telecommunication infrastructure is located within the Project or 1,000 feet buffer. Refer to Figure 6 – Utilities Map in **Appendix 2, Exhibit A-1.2**, which contains a detailed legend showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas.

5. A map of all properties upon which any component of a facility or ancillary feature would be located must show the current land use, tax parcel number and owner of record of each property, and any publicly known proposed land use plans for any of these properties. Also, identify any parcels within the project boundaries participating in farmland development rights agreements under Michigan's Farmland and Open Space Preservation Program (PA 116).

The area land use maps for the proposed Project include details of properties hosting any component of the facility or ancillary features, providing the current and/or proposed land use, tax parcel numbers, and owners of record for each property. Additionally, two parcels within the Project Area appear to be participating in Michigan's Farmland and Open Space Preservation Program (PA 116). Coordination with the Michigan Department of Agriculture and Rural Development (MDARD) is underway for proposed

Project activities located on these properties. Refer to Figure 5 – Zoning, Land Ownership, and PA 116 Map in **Appendix 2, Exhibit A-1.2**, which contains a detailed legend showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas. Refer to Summary of Agency Consultations in **Appendix 2, Exhibit A-4.4** for summary of coordination with MDARD.

i. For wind facilities, all properties within 2,000 feet of such facilities must be shown.

The proposed Project is not a wind facility, therefore Exhibit A-1.2.(a).5.i is not applicable to this Application.

6. Existing local zoning districts.

The area land use maps for the proposed Project identify all existing local zoning districts. According to the Leslie, Vevay, and Onondaga townships Zoning Maps, the proposed Project area is located entirely within the Agricultural Residential (AR) zoning district in Onondaga Township, the Agricultural (A-1) zoning district in Vevay Township, and the Agricultural (A-1) zoning district in Leslie Township. Refer to Figure 5 – Zoning, Land Ownership, and PA 116 Map in **Appendix 2, Exhibit A-1.2**, which contains a detailed legend showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas.

7. Designated coastal areas, inland waterways, groundwater management zones, designated agricultural districts, flood-prone areas, and coastal erosion hazard areas.

The Area Land Use Maps for the proposed Project identify all designated coastal areas, inland waterways, groundwater management zones, designated agricultural districts, flood-prone areas, and coastal erosion areas. Refer to Figure 2 - Water Resources Map and Figure 3 – Land Use Map in **Appendix 2, Exhibit A-1.2**, which contain detailed legends showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas. Parcels zoned as agricultural or comparable are displayed in green on Figure 5 – Zoning, Land Ownership, and PA116 Map. Agricultural districts are not located within the Project Area or within 1,000 feet.

8. Recreational and other land uses that might be affected by the sight or sound of the construction or operation of the facility, interconnections and related facilities. Identify any wild, scenic, and recreational river corridors, open spaces, known archaeological, geologic, historical, or scenic areas, parks, designated wilderness, forest lands, scenic vistas, conservation easement lands, federal or state designated scenic byways, nature preserves, designated trails, public-access fishing areas, major communication and utility uses and infrastructure, and institutional, community, and municipal uses and facilities.

The Area Land Use Maps for the proposed Project identify all recreational and other land uses potentially impacted by the sight or sound of construction or operation of the facility. Any wild, scenic, and recreational river corridors, open spaces, archaeological, geologic, and historical sites, scenic areas, parks, wilderness areas, forest lands, scenic vistas, conservation easement lands, designated scenic byways, nature preserves, trails, public-access fishing areas, communication uses, utility infrastructure, and institutional, community, and municipal facilities that were identified within the Project are shown in the Figure 6 – Utilities Map and Figure 7 – Recreational & Other Land Uses Map in **Appendix 2, Exhibit A-1.2**. Refer especially to the detailed legends showing the identifying designations—shape, color, shading, etc—for the foregoing designated areas. Communication infrastructure is not located within the Project Area or within 1,000 feet.

9. Depict the proposed facilities, adjacent properties, all structures within participating and adjacent properties, property lines, and the projected sound isolines along with the modeled sound isolines including the statutory limit and any limits that have been adopted in administrative rules by the MPSC (not applicable at this time).

The Area Land Use Maps for the proposed Project depict all planned facilities, adjacent properties, structures within participating and adjacent properties, and property lines. Additionally, the Project Pre-Construction Noise Analysis includes figures which display the projected sound isolines and modeled sound isolines, indicating compliance with statutory limits. Refer to the Sound Report and Monitoring Protocol (Pre-Construction Noise Analysis) in **Appendix 2, Exhibit A-1.7**.

10. Depict the area that will be impacted by shadow flicker for wind facilities, including isolines indicating areas expected to experience 30 hours or more per year of shadow flicker and locations of occupied structures.

The proposed Project is not a wind facility and thus the standards for approval in Exhibit A-1.2.a.10 do not apply.

For more information regarding the Area Land Use Information, see also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 7-14.

EXHIBIT A-1.3 – EXPLANATORY INFORMATION

A-1.3.(a) – Written explanations of the elements and features shown on all provided maps as well as other planned site/facility information including a description of the project area and the portion of the community where the project will be sited including socioeconomic and demographic profiles and major industries in the area. Examples of relevant project area information include geography, topography, cities, villages, townships, counties, major industries, and landmarks.

1. Provide justification for how the proposed project location, layout, construction methods, etc. minimize the following:

i. Environmental justice

The Acceleration Solar Project is located in a rural portion of Ingham County, Michigan, spanning Leslie, Vevay, and Onondaga townships. According to a screening analysis using the Public Environmental Data Partners (PEDP) EJScreen Tool—an unofficial, publicly accessible copy of the EPA’s EJScreen—approximately 14% of the population in the Project Area are people of color, 16% are over age 64, 18% are low income, and 6% have less than a high school education. No Limited English Proficiency (LEP) households were identified.

The surrounding area is primarily agricultural with low population density. Major local industries include education, healthcare, retail, construction, and manufacturing. For example, manufacturing accounts for over 28% of employment in Onondaga Township, while education and health services make up more than 36% in Vevay Township. These conditions reflect a rural working-class economy with land use patterns well aligned with solar energy development. No elevated environmental justice concerns were identified in the PEDP screening.

ii. Environmental and Natural Resource impacts

The Project is designed to be compatible with the natural environment and will be constructed, operated, and maintained to minimize any impacts to the natural environment. As reflected through the enclosed Application materials, Acceleration Solar is committed to minimizing alteration of the natural environment to the greatest extent plausible by protecting environmentally sensitive areas, such as wetlands, steep slopes, and areas subject to flooding. In addition, the Project will utilize 25’ voluntary setbacks around EGLE regulated wetlands and streams, where applicable. Any unanticipated impacts to wetlands that are discovered during the development process will be addressed in compliance with all applicable regulations and approvals from EGLE.

The Project will not impact the water quality or water supply in the area. The Project is designed such that post-construction stormwater flows will not materially exceed pre-construction flow. The Project will prevent effects to nearby natural environmental features by implementing design measures such as on-site stormwater detention. As such, the Project is unlikely to affect groundwater and drainage. Implementation of a Soil Erosion and Sedimentation Control (SESC) Plan and best management practices (BMPs) will minimize adverse effects on soil and water quality during construction and operation. The Project will comply with all County soil erosion and sedimentation control requirements as well as any additional requirements included in the EGLE Notice of Coverage (NOC) National Pollutant Discharge Elimination System (NPDES) permit. Water usage for the Project is primarily anticipated during the construction phase, with the main purposes being dust control and vegetation management. The Project will ensure that all water usage complies with relevant regulations and landowner agreements. Utilization of local wells for continual water is not anticipated for the Project. If a private well is required to serve the Project's needs, the Project will coordinate with the appropriate local government unit to secure the required permits and approvals for both the construction and operation of the well.

Desktop and field investigations were completed in the summer of 2022 and fall of 2024 to identify, delineate, and characterize wetlands, assess streams, evaluate the presence of floodplains, and determine the likely regulatory status of the identified water resources. The Project was assessed in accordance with current Michigan regulations and jurisdiction was evaluated following the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended. In the event that there are proposed impacts to state regulated floodplains and/or EGLE regulated wetlands, a Part 303, 301 and/or 31 permit would likely be required by EGLE for dredge and fill activities within regulated features. The Project will obtain all necessary EGLE permits prior to impacting regulated features requiring a permit.

Desktop and field investigations were completed in the summer of 2022 and fall of 2024 to assess the Project Area for potential habitat of threatened and endangered species (TES). Additionally, coordination with U.S. Fish and Wildlife Service (USFWS), consistent with the Michigan Endangered Species Determination Key (Michigan DKey), was conducted in January 2025 to determine the necessary conservation measures to avoid adverse effects to listed species. Given the habitat types observed within the Project area during desktop assessment, field investigations, and USFWS coordination, the Project will implement conservation measures such as seasonal tree clearing to prevent impacts to TES and their habitats.

Operation of a PV solar energy system does not generate emissions, smoke, fumes, or odors. Solar panels are constructed of layered glass, aluminum, and crystalline silicon or cadmium telluride. Crystalline silicon is a common mineral found naturally within the earth's crust, as well as in sand, stone, concrete, and mortar. Cadmium and tellurium are byproducts of mining operations for zinc and copper, respectively. All crystalline silicon and cadmium telluride cells are encapsulated and safe to handle and operate. As such, the Project will not disturb or be hazardous to any surrounding uses permitted within the adjacent zoning districts or produce any hazardous by-products, as the panels are chemically inert. Furthermore, at the end of its operational life, the Project will be removed so the land may be returned to its current use.

See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 9-14.

iii. Noise

The Project has been designed to minimize audible sound at non-participating dwellings by siting sound producing technology, such as Project inverters and substation transformer, centrally within the Project. As demonstrated by the Sound Report and Monitoring Protocol (Pre-Construction Noise Analysis), **Appendix 2, Exhibit A-1.7**, sound levels will not exceed fifty-five (55)

decibels (dB) (average hourly) at the nearest wall of any non-participating dwelling. See also **Appendix 3, Exhibit B-5**, Direct Testimony of Justin Bowers (“J. Bowers”), at pp. 3-5.

iv. Visual impacts

The Project will maintain the area’s agricultural character and visual appeal by implementing design features like setbacks, perimeter fencing, and vegetative buffering. The Applicant will attempt to work with non-participating landowners adjacent to the Project that do not already have sufficient natural vegetative screening or other obscuring structures that reasonably obscure the view of the Project to develop a landscaping plan prior to the commencement of construction. Visual paths from nearby residences to the Project infrastructure are not anticipated.

Additional information on visual impacts is addressed in Section 5 of this narrative and depicted in **Appendix 2, Exhibit A-1.1** – Preliminary Site Plan, including especially Sheets 10 and 14. See also **Appendix 2, Exhibit A-1.3** – Visual Simulations for imaging of proposed screening and buffering. The Project is proposing fencing and screening, or will utilize existing screening, to buffer the view of the Project from non-participating residences, minimizing the visual impacts of residences within each ALU. The Project is proposing fencing and screening, or will utilize existing screening, to buffer the view of the Project from non-participating residences, minimizing the visual impacts of residences within each ALU. For informational purposes, each of the three ALUs have zoning requirements that include distinct buffering requirements of solar developments, as described below:

Leslie Township Zoning Ordinance Amendment – Solar Ordinance NO. 24.01-2

Buffering Requirements

- There shall be a landscape buffer at least twenty (20) feet wide along the exterior of the project boundary. Vegetation shall provide effective visual screening year-round for the Commercial Solar Energy System, unless otherwise waived by the Township, and shall be maintained to provide such visual screening throughout the life of the project, as described below.
 - The buffer shall be installed to obscure the Commercial Solar Energy System and shall contain staggered evergreen trees or bushes planted not less than eight (8) feet apart linearly. The Township may consider an alternative landscape buffer as a part of the special land use approval, provided the alternative provides adequate screening.
 - Plantings shall be at least four (4) feet tall at time of planting and shall reach a height of ten (10) feet within three (3) growing seasons. If after the three (3) growing seasons the plantings do not totally block the view of the Commercial Solar Energy System, the Township may require additional planting.
 - The trees may be trimmed but must maintain a height of at least ten (10) feet.
 - The landscape buffer shall be a minimum of thirty (30) feet wide if adjacent to any non-participating residential dwellings.

Vevay Township Zoning Ordinance (Amended Through Ordinance 68.56 on May 7, 2024)

Perimeter Landscaping

- LSES facilities shall be required to install a perimeter landscaping screening buffer surrounding and on the exterior of the security fence, excluding access points. The intention of this screening is to avoid or reduce the visual industrial nature, glare or reflection onto nearby and adjacent properties, residences, and adjacent roadways and the public at large. The Planning Commission may reduce or eliminate the buffer zone in areas other than abutting residential uses and

roadways. The Planning Commission may require additional screening based upon topography and other factors to effectuate the buffer zone.

- The buffer zone shall be not less than twenty-five (25) feet in depth and shall be planted with assorted vegetation to provide a year-round visual buffer both at installation and in the future.
- Plantings shall be of a type and size to reach eight (8) feet in height within three (3) years.
- The number, species, and spacing of the plantings shall be sufficient to provide an adequate visual buffer as determined by the Planning Commission.
- Plantings must be maintained by the LSES Operator, and plantings that appear dead, are dead, diseased, or damaged vegetation must be replaced within 60 days upon notification by the Zoning Administrator.
- Grass and weeds must be controlled by the LSES Operator in the buffer areas during the entire growing season.
- Vegetation under and around the solar panels must be maintained by the LSES Operator with proper mowing and noxious weed control and shall not be allowed to exceed twelve (12) inches in height. Parcels subject to PA 116 agreements must meet any special vegetation and maintenance requirements and shall be subject to state law and regulations.
- All plant materials shall be installed between March 15 and November 15. All plantings shall be installed as soon as feasible once construction has commenced, but no later than commissioning. If the applicant or Operator is unable to plant during the installation period, the applicant or Operator will provide the Township with a cash deposit, a letter of credit, or surety bond for an amount equal to 150% of the cost of any planting deficiencies. The Township shall hold such funds until the next planting season, as deemed acceptable by the Township Board. After all plantings have occurred, the Township shall return the financial guarantee.

Onondaga Township Zoning Ordinance Amendment Ordinance NO. 24-02

Screening and Ground Cover. A Large Solar Energy System shall be completely enclosed by perimeter security fencing to restrict unauthorized access.

- Unless screened and buffered at all times by natural forest vegetation meeting the minimum spacing and height requirements, and having a substantially similar obscuring effect of an evergreen vegetative buffer installed pursuant to this section, a continuous evergreen vegetative buffer shall be installed and maintained at all times at the perimeter of all Large Solar Energy System, including without limitation between such Large Solar Energy System and adjacent residential or agricultural areas and/or public highways or streets. Nothing contained herein shall be construed to prevent reasonable access to any Large Solar Energy System as approved by the special land use permit.
- The evergreen or native vegetative buffer shall be composed of native or evergreen trees that at planting shall be a minimum of four feet in height and shrubs two feet in height. The evergreen trees shall be spaced no more than 15 feet apart on center (from the central trunk of one plant to the central trunk of the next plant), native trees shall be placed no more than 30 feet apart on center and shrubs shall be spaced no more than seven feet apart on center. All unhealthy (60% dead or greater) and dead material shall be replaced by the applicant within six months, or the next appropriate planting period,

whichever occurs first, but under no circumstances should the applicant allow unhealthy or dead material to remain in place for more than six consecutive months. Failure to maintain the required evergreen vegetative buffer as required by this section shall constitute a violation of this Ordinance and sufficient grounds for revocation of any special land use permit previously granted.

- All plant materials shall be installed between March 15 and November 15. If the applicant is unable to plant during the installation period, the applicant will provide the Township with a letter of credit, surety, or corporate guarantee for an amount equal to 1.5 times the cost of any planting deficiencies that the Township shall hold until the next planting season. After all plantings have occurred, the Township shall return the financial guarantee.
- A ground cover suitable for growth in the shade shall be planted within six (6) months of project completion and maintained for the duration of operation until the project is decommissioned. The ground cover planted shall be one that the USDA has determined will grow in this region. Moreover, all ground cover plantings shall comply with the Township's Noxious Weeds and Grass Ordinance.
- All landscaping and ground cover shall be maintained, orderly, and not overgrown. Ground cover plantings within the fence shall not exceed a height of eighteen (18') inches.
- The landscaping requirements above can be waived upon request by an applicant in instances where screening may be unnecessary such as in between two participating properties, in between two vacant farm fields, or in other similar situations. Moreover, the Township may accept reasonable alternative plantings from an applicant to accomplish screening of a project should the plantings have, in the Township's determination, the same or a greater screening effect of the project.

Although these local zoning ordinances are preempted under state law, they have directly informed Applicant's proposed screening plan. Due to the varying buffer requirements between ALUs, the Project has developed its proposed screening plan, which takes into account various aspects of the local ordinances as well as feedback received from local community members during neighbor outreach and public meetings held. Acceleration's proposed vegetative screening plan will allow neighboring non-participating residences to choose what type of landscaping option they would prefer. Non-participating landowners adjacent to the Project will have the ability to indicate a preference for Acceleration Solar to install and maintain one of the following: (A) trees, (B) shrubs, (C) trees and shrubs, or (D) nothing. If adjacent non-participating landowners decline to indicate a landscaping preference, Acceleration Solar may, at its option, install and maintain any of the foregoing. Existing screening will be used where applicable to minimize impact to pre-existing natural resources. For further detail as to Acceleration Solar's screening and buffering plans, refer to the Site Plan in **Appendix 2, Exhibit A-1.1** and Visual Simulations in **Appendix 2, Exhibit A-1.3**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 10-11.

v. Impacts to traffic

Construction of the Project will produce a minor increase in local traffic; however, this small increase will be temporary, and measures will be put in place to ensure traffic safety. During operation, vehicular traffic will not increase in association with the Project.

The expected traffic generated by the Project will be safely and efficiently accommodated by the existing capacity of the street system. Construction of the Project will be conducted using current street and highway infrastructure. The Project does not include any new public roadways and the

solar facility components will be set back from public road rights-of-way. Transportation and installation of the Project's components are unlikely to require special accommodations of existing infrastructure. Refer to the Site Plan in **Appendix 2, Exhibit A-1.1** for the Proposed Haul Route Plan. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 11-12.

Acceleration Solar has consulted with the Ingham County Road Department and the Michigan Department of Transportation (MDOT) regarding workforce, component delivery routes, access road design criteria, and permitting. Acceleration Solar will obtain any necessary approvals and permits and will enter into a Road Use Agreement. Access roads were designed to provide ingress and egress points for maintenance crews and emergency service vehicles and will not increase runoff to existing drains. Refer to the Summary of Agency Consultations in **Appendix 2, Exhibit A-4.4** for a summary of coordination with the Ingham County Road Department and MDOT.

vi. Impacts to solid waste disposal capacity

Waste generated throughout the Project life cycle, including construction and operation, will be handled and disposed of in a manner that complies with applicable environmental regulations. Waste and hazardous materials will be collected and stored in proper storage containers at the O&M building on-site prior to disposal. Waste that cannot be recycled will be transported to an approved landfill facility. Recyclables, such as metals, glass, plastics and paper products will be taken to certified recycling facilities. Any materials deemed hazardous will be managed according to applicable environmental regulations, with the involvement of certified hazardous waste disposal companies. The Project will require public solid waste management or municipal waste disposal services at the Project's O&M building. Any waste or debris generated during the construction of the Project will be hauled off-site and deposited in appropriate waste facilities. Refer to the Waste Analysis & Characterization Study in **Appendix 2, Exhibit A-1.3**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 12.

vii. Impacts to county and intercounty drains and preliminary plans to minimize, mitigate, and repair drainage issues; and

Acceleration Solar has consulted with the Ingham County Drain Commissioner (ICDC) for the location of existing county drains and associated easements and drain tile mapping located within the Project Area. There are two county drains located within the Project Area. The Project has requested drain tile mapping from all landowners included in the Project, as well as ICDC. Drain tile maps could be provided from some landowners, but ICDC did not have any mapping to share outside of private drains. Above-ground infrastructure will be set back from any county drain easement. If deemed necessary, a crossing permit will be obtained from the ICDC for any crossings of collection lines or access roads. Refer to the Site Plan in **Appendix 2, Exhibit A-1.1** for the location of existing private drains, county drains, and easements and their relation to the Project. Refer to the Minimize, Mitigate, and Repair Plan in **Appendix 2, Exhibit A-1.3** for a summary of measures implemented to minimize / avoid stormwater impacts. Additionally, this plan describes Acceleration Solar's plan for mitigation in the event of damages during construction. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 12-13. See also **Appendix 3, Exhibit B-4**, Direct Testimony of Craig Kantola ("C. Kantola"), at p. 5-6.

In addition, Acceleration Solar has consulted with the ICDC and has determined that stormwater detention is required for solar developments. The Project has implemented a preliminary stormwater plan designed to the requirements of the ICDC. The size and locations of stormwater basins are subject to ICDC final review of the plan and are subject to change. Refer to the Site Plan in **Appendix 2, Exhibit A-1.1** for the locations of proposed measures, and the Preliminary Stormwater Management Plan in **Appendix 2, Exhibit A-6.4** for the stormwater design guidance

and proposed stormwater improvements. Refer to Summary of Agency Consultations in **Appendix 2, Exhibit A-4.4** for summary of coordination with Ingham County Drain Commissioner.

The Project will primarily convert areas of agricultural crop development into solar energy development PV arrays with grassy ground cover, elevated solar panels, and gravel driveways to site equipment. Due to land availability, there will also be some areas of forest and pasture/meadow land cover that will be utilized for PV arrays. Typical preparation for installation of PV arrays consists of clearing vegetation with minor grading as needed to allow driving panel support posts into the ground. Generally, site grading is avoided or minimized but may be necessary due to topographical constraints (i.e., steep slopes and/or ridges/valleys within the tracker rows) to comply with tracker vendor requirements. These grading areas are localized and will not alter the existing drainage patterns to divert large areas away from their existing downstream areas.

The proposed Project's excavation and stormwater management measures are designed to prevent increased surface drainage and minimize runoff to adjacent properties. Stormwater basins at the solar facility will help maintain post-construction stormwater flows at pre-construction levels, protecting groundwater and drainage. Acceleration Solar's comprehensive stormwater assessment outlines mitigation measures to manage any potential drainage impacts. Refer to the Preliminary Stormwater Management Plan in **Appendix 2, Exhibit A-6.4**.

viii. Other impacts to non-participating property owners during construction and operation.

The Project is designed and will be constructed, operated, and maintained to prevent adverse effects on neighboring lands. In addition to the responses above, the Project is designed to include a security fence surrounding the Project and all access points. The Project's fencing is also designed to be compatible with the agricultural surroundings as the fencing will be constructed with timber posts, zinc-coated woven wire fabric and 6-inch spacing, as shown on the Site Plan in **Appendix 2, Exhibit A-1.1**. The Project has been designed to be completely enclosed by fencing that will restrict unauthorized access as required by federal regulation. A chain-link security fence, with a barbed-wire apron on extension arms, is to be used around the proposed Project substation only.

The Project complies with all Federal Energy Regulatory Commission interconnection standards. All components of the Project have been designed to comply with the National Electric Safety Code (NESC), National Electric Code (NEC), and/or Institute of Electrical and Electronics Engineers (IEEE) standards or guidelines. Acceleration Solar has consulted with the Leslie Fire Department and Mason Fire Department prior to submittal of this Application to discuss the Project layout, ensure that access roads are designed adequately for service, and share the Project's Emergency Response Plan and Fire Response Plan. In addition, Acceleration Solar will notify the Leslie Fire Department and Mason Fire Department prior to construction so that they can visit the Project during construction to obtain an on-the-ground understanding of the Project layout and access points, and protocols in place. During this visit, Acceleration Solar will provide training to the Leslie Fire Department and Mason Fire Department regarding the Project's Emergency Response Plan and Fire Response Plan.

Pollinator habitat and vegetation management are addressed in Section 5 of this narrative and in **Exhibit A-1.1 – Preliminary Site Plan**. The Project will be designed to achieve a score of 76 or higher on the Michigan Pollinator Habitat Planning Scorecard for Solar Sites. A completed scorecard will be submitted prior to construction, once final seed mixes have been confirmed. The vegetation plan will be implemented and maintained for the life of the Project, with ongoing management including mowing, watering as needed, invasive species control, and regular inspections to ensure

vegetation remains healthy and compliant. Maintenance notes and specifications are included on Sheet 14 of **Exhibit A-1.1**.

The Project will not result in glare that would impact neighboring properties or vehicles on the road. A glare hazard analysis did not predict any instances of yellow or red glare, which are considered to be impactful, reflected on any residences, businesses, or roads. Refer to the Glare Study in **Appendix 2, Exhibit A-1.3** for details. The Glare Study includes a detailed analysis that totals 1028 pages. This detailed analysis was not included in the Application. However, upon request, Acceleration Solar can provide an electronic or hard copy of the full Glare Study that includes the full analysis.

Overall, the Project is designed to protect the health, safety, welfare, social well-being, and economic well-being of those using the land, nearby residents, landowners adjacent to the Project, and the community.

For more information, see also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 11-12.

2. Provide the number of acres of the proposed site for the facility.

The proposed Project Area contains approximately 873 acres of participating land. Of this, the Project contains a fenced-in acreage containing panels of approximately 618 acres. Approximately 40 acres of participating land is designated as collection only. The Project gen-tie (approximately 0.6 miles), the POI, the Project substation, and O&M building are contained within an approximately 40-acre parcel under participation. Refer to the Participating Parcel List in **Appendix 2, Exhibit A-1.15** and the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 6-8.

3. Provide written descriptions explaining the relation of the location of the facility site, and all ancillary features not located on the facility site, to the ALUs of government.

The Project is located approximately 2.7 miles northwest of the City of Leslie (intersection of Fig Hill and Churchill Road in Leslie Township, Ingham County, Michigan). Refer to Figure 1 – Site Location Map in **Appendix 2, Exhibit A-1.2**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 7-8.

4. Provide a qualitative assessment of the compatibility of the facility, including any off-site staging and storage areas, with existing, proposed and allowed land uses located within a 1,000-foot perimeter of the facility site. The assessment shall identify the nearby land uses of and shall address the land use impacts of the facility on residential areas, schools, civic facilities, recreational facilities, and commercial areas. The assessment and evaluation shall demonstrate that conflicts from facility-generated noise, traffic, and visual impacts with current and planned uses have been minimized to the extent practicable.

The Project is designed and will be constructed, operated, and maintained to ensure compatibility with the existing land uses within a 1,000-foot perimeter. Refer to Figure 3 – Land Use Map and Figure 7 – Recreational & Other Land Uses Map in **Appendix 2, Exhibit A-1.2**. A qualitative assessment of nearby land uses has been conducted confirming that the proposed Project is compatible with these uses and will not generate adverse impacts. Surrounding land uses include agriculture, small businesses, and residential properties. There are no schools, civic facilities, or recreational facilities located within the 1,000' buffer. The Project is located in the Agricultural Residential (AR) zoning district in Onondaga Township, the Agricultural (A-1) zoning district in Vevay Township, and the Agricultural (A-1) zoning district in Leslie Township.

The Project is not expected to impact occupied community buildings and dwellings on non-participating properties, as sound mitigation measures, setbacks, and vegetative buffering will minimize noise and

visual disturbances. Additionally, the facility's operation will not increase traffic or cause other disruptions to nearby community or civic facilities.

Surrounding woodlots and farmland will be preserved to the greatest extent possible, with portions of the Project Area potentially available for continued agricultural use outside of the active operational footprint.

The proposed Project will maintain the low-density character of the region and avoid adverse effects on surface drainage through comprehensive stormwater management measures, preventing run-off to neighboring properties. The inclusion of traffic management strategies during construction and minimal operational traffic post-construction will ensure compatibility with the area's infrastructure. Overall, the Project has been designed to align with and complement the surrounding land uses, preserving the community's character while protecting the health, safety, and welfare of nearby residents and stakeholders.

See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 10.

5. Provide a description of the planned screening, landscaping, and vegetative cover. For solar developments, describe the plan to establish and maintain pollinator habitat and vegetative ground cover for the life of the proposed facility. This information is not required if the proposed facility is located entirely on brownfield land.

Acceleration Solar will attempt to work with non-participating landowners adjacent to the Project that do not already have sufficient natural vegetative screening or other obscuring structures that reasonably obscures the view of the Project to develop a landscaping plan prior to the commencement of construction. Non-participating landowners adjacent to the Project will have the ability to indicate a preference for Acceleration Solar to install one of the following: (A) trees, (B) shrubs, (C) trees and shrubs, or (D) nothing. Under no circumstances shall any vegetative screening cast shadows on the Project's photovoltaic cell panels. If adjacent non-participating landowners decline to indicate a landscaping preference, Acceleration Solar may, at its option, install (A) trees, (B) shrubs, (C) trees and shrubs, or (D) nothing. The exact species of trees and shrubs installed will be determined based on coordination with a landscaping company of Acceleration Solar's sole discretion and subject to availability at the time of procurement/planting. Refer to the Proposed Landscape Plan included with the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 13-14.

Acceleration Solar has committed to seeding the fenced-in areas of the Project with a mix of pollinator-friendly and other vegetation determined to be appropriate for the region that will be compatible with the surrounding landscape and meets or exceeds pollinator standards throughout the lifetime of the proposed facility as established by the "Michigan Pollinator Habitat Planning Scorecard for Solar Sites" developed by the Michigan State University Department of Entomology in effect on February 27, 2024. Upon completion of construction activities, native, weed-free grass seed mixtures and pollinator blends will be planted for final stabilization of the site. If there is an opportunity to graze sheep or other animals, Acceleration Solar will plant a forage mix appropriate for grazing. Establishment of regionally appropriate seed mixes will allow land within the Project previously used for agriculture to become fallow, optimizing soil health and creating the conditions to allow productive farmland to return to a traditional agricultural use after the operational life of the Project. Pollinator-friendly vegetation will decrease erosion, increase stormwater control, increase biodiversity, and maintain the character of the surrounding area. Ground cover will be comprised of a short-growth seed mix that will be spread under the panels and around access roads within all fenced-in areas of the Project. In addition, existing farmland outside of fenced-in areas of the Project will either be used for continued farming by the landowner or converted to pollinator habitat, managed by Acceleration Solar. This will be determined during landowner negotiations and included on the final site plan prior to construction. These areas will be regularly maintained to ensure that plantings under the array do not present a fire hazard and to properly prune and maintain for aesthetic purposes.

Refer to the Proposed Vegetation Management Plan included with the Site Plan in **Appendix 2, Exhibit A-1.1**.

i. Describe the plan to meet or exceed pollinator standards throughout the lifetime of the proposed facility as established by the “Michigan Pollinator Habitat Planning Scorecard for Solar Sites” developed by the Michigan State University Department of Entomology in effect on February 27, 2024, or any applicable successor standards approved by the Commission.

ii. Explain how the seed mix used to establish pollinator plantings shall not include invasive species as identified by the Midwest Invasive Species Information Network, led by researchers at the Michigan State University Department of Entomology and supporting regional partners.

The Project is designed and will be planted to achieve a score of at least 76 on the Michigan Pollinator Habitat Planning Scorecard for Solar Sites developed by the Michigan State University Department of Entomology, or any applicable successor standards approved by the Commission. A completed scorecard will be submitted prior to construction, once final seed mixes have been confirmed. Native, weed-free grass seed mixtures and pollinator blends will be planted on-site after completion of construction. Vegetative groundcover will contain a regionally appropriate seed mix that is free of invasive species. Routine maintenance throughout the fenced in areas containing the PV arrays will be completed to upkeep planted vegetation and for invasive species prevention. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 13-14.

6. Provide a written description of how planned fencing complies with the version of the National Electric Code in effect on November 29, 2024, or as approved by the Commission.

The Project is designed with perimeter security fencing that meets the requirements of the NEC. The Project has been designed to be completely enclosed by fencing that will restrict unauthorized access as required by federal regulation. The Project’s fencing is also designed to be compatible with the agricultural surroundings as the fencing will be constructed with timber posts, zinc-coated woven wire fabric and 6-inch spacing. A chain-link security fence, with a barbed-wire apron on extension arms, is to be used around the proposed substation only. The NEC requires seven-foot-tall fencing around the PV areas. Outside of the substation, fencing for the Project is planned to be seven feet tall, consisting of timber posts with zinc-coated woven wire fabric and 6-inch spacing, as shown in the Security Details included with Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 14.

To ensure the installation meets the requirements of NEC, and to protect people from dangerous step and touch potentials that can occur during a ground fault or lightning strike, the Project will conduct a grounding and bounding study during the Engineering, Procurement, and Construction (EPC) firm’s preparation of the final site plan. The grounding and bonding study will include a site assessment, soil testing, system modeling, and electrical testing. Based on the analysis of results, the Project will be designed with selective materials and sizes to safely conduct fault currents and dissipate energy from fencing around the substation or other energized equipment. Included within **Appendix 2, Exhibit A-1.3** is a representative substation drawing showing how energized equipment will be grounded/bonded in compliance with NEC. This exact design is not being proposed for the Acceleration project, rather it is an example of what has been designed on former Ranger Power projects. During construction preparation, a final substation design will be prepared for Acceleration that follows NEC 2023 Article 250.190.

EXHIBIT A-1.4 – CONSTRUCTION INFORMATION

A-1.4.(a) – Describe the project’s proposed construction and installation methods including:

1. Soil surveying and testing plans, pursuant to NREPA.

The Project will conduct soil surveying and testing, pursuant to the Natural Resources and Environmental Protection Act (NREPA). In an initial review of the Project Area, desktop National Resources Conservation Service (NRCS) Soil Data was used to confirm suitable soil types for constructing a solar energy facility. Prior to construction, soil borings will be taken at multiple points throughout the Project Area to instruct final civil engineering requirements. Implementation of a Soil Erosion and Sedimentation Control (SESC) Plan and best management practices (BMPs) will minimize adverse effects on soil and water quality during construction and operation. The Project will comply with all County soil erosion and sedimentation control requirements as well as any additional requirements included in the EGLE Notice of Coverage (NOC) National Pollutant Discharge Elimination System (NPDES) permit. Following final construction design of the Project, Acceleration Solar intends to submit an SESC permit application through the Ingham County Drain Commissioner prior any ground disturbance activities requiring a permit. Refer to Vegetation Management Details on Sheet 14 and Solar Details & Construction Information on Sheet 16 of the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-3**, Direct Testimony of Aileen Kenney (“A. Kenney”), at p. 3.

The Project completed a Phase I Environmental Site Assessment (ESA) in January 2025 as a preliminary investigation of the Project Area environmental conditions. The Phase I ESA was conducted in accordance with the Environmental Protection Agency (EPA) All Appropriate Inquiries (AAI) Rule (40 CFR Part 312) and American Society for Testing and Materials (ASTM) Standard E2247-23 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property). The purpose of the assessment was to identify the presence or likely presence of any hazardous substances or petroleum products in or around the Project Area. The Phase I ESA included a site reconnaissance of the Project Area, interviews with the property owners, and a review of available environmental records concerning the properties and surrounding areas. Based on the results of the findings from the assessment, it is the opinion of the Environmental Professional that no Recognized Environmental Conditions (RECs) were identified within or adjacent to the subject property. Therefore, it was not recommended or necessary for Acceleration Solar to complete a Phase II ESA or Biological Environmental Assessment (BEA) which would include water or soil sampling for hazardous substances. Refer to Phase I Environmental Site Assessment in **Appendix 2, Exhibit A-1.4. 2. Grading and excavation.**

Grading for the Project is expected to be minimal with grading completed only where required to meeting tracker clearance requirements, stormwater management requirements for freeboard and scour potential, and the smooth out proposed access roads for site access. Temporary laydown yards will also be constructed within the Project site. These will be placed in flat areas where minimal smoothing will be required. They will be brought back to natural conditions at the completion of construction. Areas with proposed grading will be evaluated and appropriate temporary and permanent erosion and sediment control features will be installed to stabilize the site and protect adjacent properties. Areas requiring excavation for the installation of Project infrastructure will be restored to existing conditions to the maximum extent practicable. Proposed grading methods will involve the use of excavators and graders outfitted with modern digital grade control technologies. Refer to Solar Details & Construction Information on Sheet 16 of the Site Plan in **Appendix 2, Exhibit A-1.1** for additional details on the grading requirements for proposed project infrastructure. See also **Appendix 3, Exhibit B-3**, Direct Testimony of A. Kenney, at pp. 3-4.

3. Construction of temporary and permanent access roads, staging areas, and laydown areas and trenches.

The Project will have a primary laydown yard adjacent to the Project substation. Secondary smaller laydown areas will be necessary within PV areas, but the size, location, and quantity will be determined prior to construction. Refer to Proposed Conditions on Sheets 5-9 and Solar Details & Construction Information on Sheet 16 of the Site Plan in **Appendix 2, Exhibit A-1.1** for the laydown yard location and details on the construction of the Project’s temporary laydown yards. Temporary access roads are not

currently anticipated for the Project. Refer to Proposed Conditions on Sheets 5-9 and Crossing and Access Road Details on Sheet 15 of the Site Plan in **Appendix 2, Exhibit A-1.1** for permanent access road locations and details. See also **Appendix 3, Exhibit B-3**, Direct Testimony of A. Kenney, at p. 4.

4. Stringing of cable and/or laying of pipe.

Refer to Crossing & Access Road Details on Sheet 15 and Solar Details & Construction Information on Sheet 16 of the Site Plan in **Appendix 2, Exhibit A-1.1** for details on the installation of the proposed collection cable. See also **Appendix 3, Exhibit B-3**, Direct Testimony of A. Kenney, at p. 5.

5. Installation of electric transmission line poles and structures, including foundations.

The Project will require an approximately 300-foot overhead electric transmission line from the Project substation to a proposed International Transmission Company (ITC) switchyard (to be permitted and constructed separately by ITC). Details regarding these structures, foundations and methods of construction will be determined later in the engineering process once utility requirements have been determined. See **Appendix 3, Exhibit B-3**, Direct Testimony of A. Kenney, at p. 5.

6. Depth of underground infrastructure.

The Project will install all underground collection at a minimum of 4 feet below existing grade. 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 on Solar Details & Construction Information on Sheet 16. See also **Appendix 3, Exhibit B-3**, Direct Testimony of A. Kenney, at pp. 5-6.

7. Post-construction restoration.

Refer to Proposed Vegetation Management Details on Sheet 14 of the Site Plan provided in **Appendix 2, Appendix 2, Exhibit A-1.1** for details on temporary and permanent stabilization to occur following construction activities. Restoration will be done as soon as practical following construction. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 14-15.

8. Maps showing the following:

i. The planned routes (may be preliminary) for cranes and other heavy equipment.

Refer to Sheet 12 (Proposed Haul Route Plan) of the Site Plan provided in **Appendix 2, Exhibit A-1.1** for the preliminary haul routes for delivering PV array components to the site. To the extent cranes are needed for construction of the Project they will be restricted from travelling on non-project roads. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 14-15.

ii. The location of any existing deeded easement granted to any entity within the footprint of the facility.

Refer to Existing Conditions on Sheet 3, Proposed Setbacks on Sheet 4, and Proposed Conditions on Sheets 5-9 of the Site Plan provided in Exhibit A-1.1 for the location of known easements at this stage of development. As development progresses, additional easement locations may be identified and will be incorporated and accounted for in the design and placement of project infrastructure. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 6-7.

iii. The location of known existing and proposed county and intercounty drains, drain easements, and underground drainage tile including data provided by the county drain commission or the property owner as applicable and to the extent available.

The location of known county drains, private drains, and private drain tile within the Project Area are displayed in Existing Conditions on Sheet 3, Proposed Setbacks on Sheet 4, and Proposed Conditions on Sheets 5-29 of the Site Plan in **Appendix 2, Exhibit A-1.1**. The Applicant has coordinated with Ingham County Drain Commission to obtain easement locations to be incorporated in the Project design. The Project has requested drain tile mapping from all landowners included in the Project, as well as ICDC. Drain tile maps could be provided from some landowners, but ICDC did not have any mapping to share. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 12-13.

EXHIBIT A-1.5 – ALTERNATIVES

A-1.5.(a) – Provide a map and description of each alternative site location, proposed site layout, or other alternatives that are or were considered, including rationale for why alternative locations were not selected for development.

If the proposed site of the energy facility is undeveloped land, the applicant must provide a description of feasible alternative developed locations, including, but not limited to, vacant industrial property and brownfields, and an explanation of why they were not chosen for the project site.

Ranger Power is a developer of large utility-scale solar farms. Its projects typically range from 75 MW to 400 MW. Ranger Power seeks solar development opportunities throughout Michigan and the Midwest.

Ranger Power used Pivot, a renewable energy siting and suitability tool, in the early-stage site selection process. Parcels were evaluated based on desktop and GIS resources including environmental, wetland, and geotechnical data as well as utility infrastructure and feasibility. The process that Ranger Power follows in finding and evaluating potential project sites varies; however, the elements described below are fundamental to the process and were used in Ranger Power’s review of potential areas in the state of Michigan.

Phase I

The first phase of assessment eliminates areas of poor resource or other siting flaws as described below.

- **Transmission and Injection Capacity** – Nearby electric transmission infrastructure is necessary to connect a project to the power grid. A project substation and additional transmission lines are often necessary, however the cost required to connect a project to the grid increases with the distance over which project-specific transmission must be built.
- **Land availability** – Large open areas are necessary for utility-scale solar facilities. Areas of high residential density are eliminated in the first phase of the search for an eventual project site.

Phase II

The second phase of assessment is a more focused evaluation of areas identified as feasible in Phase I.

- **Land use** – Large tracts of open land must be available to support the responsible siting of solar panels. Solar Projects are an agrivoltaic use that is naturally compatible with agricultural land and can be returned to agricultural.
- **Community** – Acceleration Solar values working with communities that welcome responsible economic development opportunities.
- **Potential host landowners** – Prospective landowners are visited to gauge interest in hosting project facilities.

- Environmental concerns – A site suitability tool was run to screen for environmental factors including, but not limited to, wetlands, waterways, trees, critical habitat, endangered plants and animals, and hydric soils. The Project areas selected showed few environmental factors, and those factors identified can be avoided by placement of the solar PV array.
- Cultural and Historic Resources - Archaeological, cultural, and historical resources were considered during the site selection and Project design. The areas selected will not impact known archaeological, cultural, or historical resources.
- Constructability – Topography (elevation and slope), as well as soils and subsurface geology are reviewed at a desktop level. Detailed field analyses are performed later in the development process.
- Road infrastructure – Highways and roads within the proposed Project Area are reviewed for compatibility with large construction vehicles and delivery trucks. Main highways feeding into the area from major ports or rails are also considered for delivery of panels and other components.
- The evaluation that led to the final site selection was a mix of both quantitative and qualitative functions described above and did not include a weighting of different factors.

Phase III

The final phase of preliminary site assessment often overlaps with the tasks outlined in Phase II. Leases, Easements, and Purchase Option agreements are signed. Resource assessments, feasibility, suitability and environmental reviews are performed in the field.

Ranger Power identified the Midwestern United States as a promising potential market for solar farms in 2017, due to the low penetration of such facilities. One of the most significant factors enabling solar development in this region has been the dramatic decline in the cost of utility-scale ground-mounted solar systems due to a combination of improving technology, equipment and installation methods. Economies of scale make Michigan-based projects cost competitive with traditional forms of energy generation.

The Acceleration Solar Project was identified following a rigorous analysis of three key factors: the existing transmission grid in Michigan, the suitability of available land, and the receptiveness of the community.

With respect to the grid analysis, Ranger Power looks for injection points where the existing electrical infrastructure is robust. This minimizes the interconnection facility costs and network upgrades frequently attributed to new generating facilities. In addition, Ranger Power prioritizes projects where land is available adjacent to the point of interconnection to minimize the length of high voltage transmission generation tie lines and the number of structures that support them. For the Acceleration Solar Project, the projected network upgrade costs are anticipated to be manageable, and the Project substation will be located directly adjacent to the ITC Substation/Transmission Line, minimizing the need for additional high voltage infrastructure.

With respect to suitability of available land, solar farms are best sited on tracts that are relatively flat. The use of cleared land minimizes impacts from shading and the need to remove trees. It also significantly reduces the likelihood that sensitive flora or fauna inhabit the area.

With respect to receptiveness of the community, Ranger Power places great importance on community-supported projects. In order to be a good neighbor, it is important that the Project start on the right foot by being transparent and being in constant communication with the public. The Ranger Power team engages local landowners, neighboring landowners, municipal leaders, and state legislators early on in its development process.

The area ultimately selected and evaluated for the Acceleration Project encompassed approximately 873 acres all within proximity to the proposed point of interconnection to the grid at the ITC Substation/ Transmission Line located near the intersection of College Road and Plains Road. The total acreage of the facility proposed within this Application was evaluated based on topography, environmental concerns, land rights, proximity to the point of interconnection, and willing landowner participation.

Ranger Power, as a private developer, sought and evaluated prospective areas for solar energy development in Michigan and the Midwest. Ranger Power considered brownfield as well as greenfield sites. However, the proposed Project requires 618 acres of nearly contiguous developable land in close proximity to existing transmission facilities. There were no brownfield sites identified in Michigan that meet these siting requirements.

Acceleration Solar reviewed the Open and Closed Landfill/Brownfield Site Boundaries available throughout Ingham County. Many sites less than 25 acres are scattered throughout the county.

Two of the overriding siting principles that limit the practicable locations for utility scale solar developments are 1) having enough contiguous land to support a large-scale project (in the case of the Project, approximately 618 acres), and 2) immediate proximity to a viable grid interconnection point for the power. The brownfield sites Acceleration Solar evaluated all fail to meet these two overriding siting principles.

Acceleration Solar considered potential areas throughout the state of Michigan and used several factors to select the area evaluated for the Project which encompasses a 2.5-mile radius within proximity to the proposed point of interconnection to the grid at the ITC Substation / Transmission Line located near the intersection of College Road and Plains Road. The total acreage of the facility proposed within this Application was evaluated based on topography, environmental concerns, land rights, proximity to the point of interconnection, and willing landowner participation.

In order to demonstrate how various siting constraints within a given area impact suitability for solar development, Acceleration Solar has prepared Alternative Maps in **Appendix 2, Exhibit A-1.5, Appendix A**. While this is in no way an exhaustive list of the various criteria that can impact suitability for solar development, the four criteria included in Maps 1-4 are some of the most impactful. The constraints shown are as follows:

- Map 1: Transmission Proximity – Suitable parcels shown within two miles of the adjacent high voltage transmission line
- Map 2: Parcel Size – Suitable parcels shown that are greater than 40 acres
- Map 3: Zoning District – Suitable Parcels zoned as agricultural or comparable. Vevay Township includes a Solar Overlay District for all of Section 31.
- Map 4: Wetland and Forested Areas - Suitable Parcels with 40 acres or more of buildable land (non-forested and non-wetland)
- Map 5: Suitable Parcels meeting the conditions of Maps 1-4. Parcels that did not meet all four criteria were excluded from consideration for the Project.

Refer to Alternatives Examples in **Appendix 2, Exhibit A-1.5, Appendix B** for specific locations within the Project Area that Acceleration Solar made changes in the layout prior to the submission of the Application.

For more information, see also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 15-16.

EXHIBIT A-1.6 – CHANGES

A-1.6.(a) – Provide a map and description of any known potential modifications or variations in the proposed Site Plan that are being considered at the time of filing and that will be finalized prior to construction.

Acceleration Solar anticipates that the following general Project details have the potential to be modified or vary from the proposed Site Plan and will be finalized before construction:

- Changes in technology
 - Project equipment has not been procured at the time of this Application submittal, and final equipment selection will be made by the EPC contractor prior to the commencement of construction. Panels, racking, trackers, and inverters are all subject to change, although the Project will make its best attempt to utilize similar technologies at which is currently proposed. Changes in technology may warrant modifications of the layout to satisfy all requirements of PA233.
 - Tracker selection may affect slope tolerance/grading requirements. Any changes to the final grading plan due to a change in tracker will not produce additional stormwater runoff to adjacent properties. Any changes to the final grading plan will require review and approval by the Ingham County Drain Commissioner.
 - Inverter selection may affect sound levels produced that would require sound mitigation or locations to be moved away from residences and roads for compliance with sound requirements. Any change to inverter technology will not generate increased impacts to residences or adjacent landowners outside of the allowable threshold of PA233. Array locations and orientation within approved fence lines
 - During the final site plan preparation by the Project EPC, portions of solar arrays may be removed entirely or shifted within approved fence lines due to construction feasibility, site optimization, and landowner requests.
 - Specific potential changes include Changes #2-#7. Refer to Exhibit A-1.6 Changes.
 - No additional impacts to nearby residences, non-participating parcels, or natural resources would occur as a result of these changes.
- Access road locations
 - During the final site plan preparation by the Project EPC, access road locations may change due to construction feasibility, landowner requests, and approval from the Ingham County Road Department.
 - Specific potential changes include Change #1 and #8. Refer to Exhibit A-1.6 Changes.
 - No additional impacts to nearby residences, non-participating parcels, or natural resources would occur as a result of these changes.
- Collection line locations
 - At this stage in development, the Project has not conducted electrical design, so the size, quantity, and locations of underground collection lines are subject to change. Electrical design will be conducted by the EPC during final site plan preparation.
 - A specific potential change includes Change #9. Refer to Exhibit A-1.6 Changes.
 - No additional impacts to nearby residences, non-participating parcels, or natural resources would occur as a result of these changes.

- Preliminary stormwater basin design
 - The Project has coordinated with ICDC for their stormwater requirements and design criteria for solar projects, although a final stormwater plan has not yet been prepared or approved. Size and location of preliminary stormwater basins included in the Project are subject to change. The final stormwater plan will be prepared along with the grading plan by the EPC during final site plan preparation.
 - As long as the Project footprint and stormwater run-off does not increase, no additional impacts to nearby residences, non-participating parcels, or natural resources would occur as a result of these changes.
- Project substation location
 - The Project substation may move within parcel number 33-10-10-31-300-002. The proposed ITC Switchyard may also move within the parcel, however, permitting of the proposed ITC Switchyard will be completed separately by ITC. This change would not require a change in substation ownership. Project substation location will be finalized by the EPC during final site plan preparation.
 - Refer to Exhibit A-1.1 – Planned Facilities Sheet 7.
 - No additional impacts to nearby residences, non-participating parcels, or natural resources would occur as a result of this change.
- Project temporary laydown yard
 - During the final site plan preparation by the Project EPC, the location of the proposed temporary laydown yard may change due to construction feasibility and final siting of the Project substation and ITC switchyard.
 - Refer to Exhibit A-1.1 – Planned Facilities Sheet 7.
 - No additional impacts to nearby residences, non-participating parcels, or natural resources would occur as a result of this change.

A map depicting specific locations of potential modifications or variations listed above is included in **Appendix 2, Exhibit A-1.6: Changes**. Acceleration Solar has discussed potential changes in the design with MPSC during the pre-application meeting. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 15-16.

A-1.6.(b) – Minor changes are not required to be submitted. A minor change is any change within the project footprint that still allows the facilities to meet all of the criteria outlined in PA 233, does not create new or additional impacts and does not require new permits; however, a minor change does not include any of the following:

- 1. A change that would expand the footprint or perimeter of the Site Plan.**
- 2. A change in planned technologies (such as the addition of an energy storage facility to an existing site or other technological changes increasing noise or impacting permit requirements).**
- 3. Reduced setback distances from any part of the planned facilities to occupied structures, non-participating property lines, or rights-of-way if the new setbacks violate any setback requirements in PA 233.**
- 4. Any change that affects water detention or retention or other stormwater runoff.**
- 5. An increase in the height of the tallest equipment or structures.**

6. Repowering.

7. Any increase of noise impacts to non-participating structures above the 55 dB average hourly limit.

Acceleration Solar understands that minor changes to the Site Plan will not require re-submission as long as the changes do not create new or additional impacts, as described in the seven criteria above.

EXHIBIT A-1.7 – SOUND REPORT AND MONITORING PROTOCOL

A-1.7.(a) – Submit a report detailing the sound modeling results along with proposed preconstruction (optional) and postconstruction sound monitoring plans to be completed upon receipt of a siting certificate from the Commission as well as mitigation plans to ensure that sound emitted from the facilities will remain below the statutory limit throughout the operational life of the facilities. An overview of the sound report requirements is provided below.

- 1. Sound modeling must be conducted following the requirements of International Organization for Standardization (ISO) 9613-2 (2024), “Engineering method for the prediction of sound pressure levels outdoors.”**
- 2. The purpose of the Sound Report is to provide the Commission with information necessary to assess if the facility meets the noise limits defined in MCL 460. 1226.**
- 3. All sound studies shall be completed by or under the direction of a qualified noise control engineer whose qualifications are documented in the report.**
- 4. The sound monitoring should generally follow the requirements of the American National Standards Institute (ANSI) S12.18 and ANSI S12.9 Part 3, where applicable.**
- 5. Reporting shall include, but is not limited to, the following:**
 - i. Facility Description**
 - ii. Maps and descriptions of sources and monitoring locations, including the distance from each to the nearest facility equipment.**
 - iii. Sound Modeling Results**
 - iv. Discussion including an assessment of the noise impacts and ability to meet MCL 460.1226.**
- 6. Submit a Pre-construction Sound Monitoring Protocol (optional) in accordance with the guidance.**

The Project has been designed to minimize audible sound at non-participating property lines, residences, and roadways by siting Project inverters centrally within participating parcels. The nearest inverter to a non-participating residence is approximately 637 feet. The Project substation is located approximately 1322 feet northeast of non-participating residence. Hankard Environmental, a Wisconsin based noise consultant that assesses acoustics for renewable energy developments including solar, was contracted to conduct pre-construction sound modeling assessments for the Project. Refer to the Pre-Construction Noise Analysis in **Appendix 2, Exhibit A-1.7**. See also **Appendix 3, Exhibit B-5**, Direct Testimony of J. Bowers, at pp. 3-5.

The Pre-Construction Noise Analysis has been created in full compliance with all listed regulations. This report includes sound modeling results, conducted per ISO 9613-2 (2024) standards, to predict outdoor sound pressure levels, and ensures the facility meets the noise limits set by MCL 460.1226. Prepared under the direction of a qualified noise control engineer, the report follows ANSI standards S12.18 and S12.9 Part 3 for sound monitoring. The document includes a facility description, maps and descriptions of sound sources and monitoring locations, modeling results, and an assessment of compliance with noise limits.

As demonstrated by the Project's Pre-Construction Noise Analysis, sound levels will not exceed fifty-five (55) decibels (dB); (average hourly) at the nearest wall of any non-participating dwelling.

7. Submit a Post-construction Sound Monitoring Protocol in accordance with the guidance.

Following completion of construction, Hankard Environmental, or another qualified sound consultant, will produce a post-construction sound monitoring protocol which will include testing of sound at non-participating dwellings adjacent to the Project to verify compliance with the fifty-five (55) decibels (dB) requirement. If any report is found to exceed the statutory requirements, a plan will be prepared to address and implement noise mitigation measures. Additional post-construction sound monitoring will be conducted until the Project is found to be in compliance. The post-construction sound measurements will comply with sound modeling and measurement procedures adopted by the Commission, including the requirements outlined in AFIP Attachment D-4.2, and will be filed to the case docket within 60 days of the measurements being taken. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 19-20.

EXHIBIT A-1.8 – SHADOW FLICKER REPORT (WIND FACILITIES ONLY)

The proposed Project is not a wind facility and thus the standards for approval in Exhibit A-1.8 do not apply.

EXHIBIT A-1.9 – EMERGENCY RESPONSE PLAN

A-1.9.(a) – The Emergency Response Plan (ERP) shall include:

1. Evidence of consultation or a good-faith effort to consult with local first responders and county emergency managers to ensure that the ERP is in alignment with acceptable operating procedures, capabilities, resources, site access, etc.

The Project is designed to promote safety during construction and operation in accordance with applicable township, county, state, and federal requirements, as well as industry best practices. Acceleration Solar has consulted with the provided technical information and resources to local emergency services before and after construction to ensure they are equipped to respond to emergencies, if needed. Acceleration Solar contacted the Ingham County Sheriff's Department and met with Andy Denzer, the captain, and Bob Boerkoel, the Emergency Manager, to review the Project's Emergency Response Plan, which is in alignment with acceptable operating procedures, capabilities, resources, and site access. Refer to the Emergency Response Plan in **Appendix 2, Exhibit A-1.9** and Summary of Agency Consultations in **Appendix 2, Exhibit A-4.4**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

2. An identification of contingencies that would constitute a safety or security emergency (fire emergencies are to be addressed in a separate Fire Response Plan (FRP)).

The contingencies that would constitute a safety or security emergency at the Project include natural disasters or severe weather events such as tornadoes, flooding, hurricanes, blizzards, high wind conditions, earthquakes, wildfires, and severe thunderstorms, which can pose significant risks to personnel, equipment, and the facility. Personnel health emergencies, including injuries, serious health conditions, and pandemic events, also qualify as safety emergencies, especially if they involve the potential spread of infectious diseases. Environmental incidents, such as spills or releases of chemicals, oil, fuels, or heat transfer fluids, are considered emergencies due to their potential to harm personnel and the surrounding environment. Security emergencies encompass physical security events such as intrusions, drone activity, bomb threats, sabotage, vandalism, terrorism, or any unusual disturbances at the facility. Additionally, cyber security incidents, including data breaches or other cyber-related threats, require immediate action to preserve evidence and mitigate risks. Emergencies may also arise from capacity or transmission events that jeopardize operational safety or public safety, requiring appropriate response measures to protect personnel and infrastructure.

The Project is not expected to have impacts on emergency medical services and staff. Acceleration Solar is committed to coordinating with local fire and emergency personnel prior to the commencement of operation to answer questions and establish knowledge of onsite emergency protocols. Refer to the Emergency Response Plan in **Appendix 2, Exhibit A-1.9** and the Fire Response Plan in **Appendix 2, Exhibit A-1.10**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

3. Emergency response measures by contingency.

Emergency response measures for each contingency involve detailed, specific actions designed to safeguard personnel, equipment, and the environment.

For natural disasters or severe weather events such as tornadoes, flooding, hurricanes, and severe thunderstorms, the site leader shall monitor weather conditions using local broadcasts or on-site weather systems and will notify management when a severe weather watch is issued. If conditions warrant, the solar facility may be shut down, and personnel directed to seek shelter in designated secure indoor locations or other reinforced structures. Hazardous locations shall be evacuated in lightning or high winds, portable equipment shall be stored indoors, and loose debris shall be secured to prevent hazards. Communication equipment shall be checked, and survival kits are prepared for winter conditions. A general housekeeping inspection ensures all doors, equipment, and trashcans are secured. Personnel must be accounted for, and outdoor work shall be limited to essential, safety-guided tasks during adverse conditions.

In the event of personnel health emergencies, such as injuries or serious health conditions, the first response is to immediately call 911 for external medical assistance. On-site first aid kits and automated external defibrillators (AEDs) are available to provide initial care. During a pandemic, screening stations may be set up at facility entry points, and protocols such as social distancing, safe hygiene practices, and potential travel restrictions are implemented to minimize transmission risks. Essential personnel reporting to the site must adhere to these safety measures while non-essential activities may shift to remote operations.

For environmental incidents, such as chemical or fuel spills, the initial response involves Acceleration Solar warning others in the vicinity and moving all personnel to a safe distance. On-site personnel may take preliminary measures, such as setting up barricades and containing the spill, but Acceleration Solar will contract trained external responders to handle cleanup, in accordance with EPA and OSHA HAZWOPER regulations.

In the event of physical security emergencies, such as intrusions, vandalism, bomb threats, sabotage, or terrorism, the individual discovering the issue must report it immediately to the site leader or security operations team. Law enforcement and community safety organizations will be contacted immediately, and alerts will be issued to nearby residents if the breach poses a direct risk to the community. Bomb threats or suspected acts of terrorism may involve evacuation or shelter-in-place measures depending on the situation, with all personnel accounted for using sign-in logs. Cyber security emergencies require personnel to report incidents immediately and preserve the current state of affected devices for forensic evidence, avoiding actions like resetting or disconnecting unless directed by authorities.

For capacity or transmission events, system performance shall be monitored continuously, and automated shutdown protocols must be activated if equipment operates outside predefined parameters to prevent further risks. Emergency egress plans, including pre-designated muster areas, ensure personnel can evacuate safely and efficiently if required. At muster points, the site manager or a designee shall bring sign-in logs to account for all personnel, contractors, and visitors, maintaining clear communication until the emergency is resolved. Refer to the Emergency Response Plan in **Appendix 2, Exhibit A-1.9** and the Fire Response Plan in **Appendix 2, Exhibit A-1.10**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

4. Evacuation control measures by contingency.

Evacuation control measures for each contingency are designed to ensure the safety and accountability of all personnel, visitors, and contractors while minimizing risks.

For natural disasters or severe weather events, such as tornadoes, hurricanes, or earthquakes, personnel are directed to designated secure indoor shelter locations or other reinforced structures. If evacuation is necessary, predetermined egress routes must be utilized unless deemed unsafe, in which alternate muster areas shall be identified. Personnel are strictly prohibited from remaining in unsafe outdoor areas during high winds or lightning. The site leader shall ensure all personnel are accounted for using sign-in logs at muster points and communicate evacuation updates as weather conditions evolve.

In the case of personnel health emergencies, evacuation measures focus on facilitating rapid access for emergency medical responders. Personnel not directly involved in aiding the situation are directed to a safe area away from the emergency site to prevent interference and maintain safety. For pandemic-related emergencies, containment protocols may involve limiting on-site personnel to essential staff only, with others evacuated to remote work locations.

During environmental incidents, such as chemical or fuel spills, personnel are evacuated to a safe distance away from the spill site and are instructed to avoid areas downwind or downhill from the spill. Muster points shall be used to account for personnel while responders assess the spill and containment measures are implemented. If the spill poses a community risk, further evacuations may be coordinated with public emergency services.

For physical security emergencies, such as intrusions, bomb threats, or acts of vandalism, evacuation control measures depend on the nature of the threat. Bomb threats, for instance, may necessitate an immediate evacuation to muster points located at a safe distance from the facility. Personnel shall be advised to follow designated evacuation routes unless the routes are compromised, in which case alternate muster points shall be used. The site leader will ensure the accountability of all personnel using sign-in logs. During cyber security emergencies, evacuations are typically not required unless a physical security threat accompanies the incident, in which case the same protocols for physical threats are followed.

For capacity or transmission emergencies, evacuation is typically unnecessary unless the malfunction poses a direct physical safety risk, such as fire or explosion hazards. If evacuation is needed, automated shutdown systems will secure the facility, and personnel shall follow egress routes to muster points, where accountability measures will ensure everyone is safely evacuated.

Across all contingencies, the site manager shall maintain communication with emergency responders and ensure personnel safety until the situation is resolved. When necessary, the site manager will ensure that all necessary parties, including nearby residents, are contacted so they can safely evacuate. Refer to the Emergency Response Plan in **Appendix 2, Exhibit A-1.9** and the Fire Response Plan in **Appendix 2, Exhibit A-1.10**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

5. Community notification procedures by contingency.

Community notification procedures vary by contingency to ensure timely and accurate communication with external stakeholders and emergency services when required.

For natural disasters or severe weather events, community notifications are generally not required unless the event poses a direct threat to surrounding areas. In such cases, the site leader shall coordinate with local emergency management agencies to provide relevant updates, ensuring alignment with community safety measures. For instance, if severe weather causes structural damage or increases the risk of debris impacting nearby areas, local authorities should be informed immediately.

During personnel health emergencies, such as severe injuries or medical emergencies, the primary notification is to 911 to engage local medical responders. There is no broad community notification unless the incident involves a public health risk, such as a pandemic. In the event of a pandemic, the facility shall follow public health guidelines and communicate with local health authorities regarding containment measures, screening procedures, and any restrictions impacting external stakeholders. Updates may also be shared with the community as directed by public health officials.

While rare and very unlikely, for environmental incidents such as spills or chemical releases, the community notification process is critical if there is potential harm to nearby populations or the environment. The site leader shall evaluate the severity of the incident and, if needed, contact 911 and local environmental agencies to initiate appropriate emergency responses. The community may be alerted through these agencies to ensure public safety, especially if evacuation or shelter-in-place orders are necessary due to airborne or waterborne hazards.

In the case of physical security emergencies, such as intrusions, bomb threats, or acts of sabotage, community notifications depend on the level of threat. For severe incidents like bomb threats or suspected terrorism, local law enforcement and emergency response teams must be notified immediately via 911. Notifications may extend to neighboring facilities or residents if the situation poses a broader risk. For less severe events, such as vandalism or minor disturbances, the facility's security team shall determine whether additional community notification is required, typically coordinating through law enforcement.

For cyber security emergencies, there is generally no direct community notification unless the incident has external implications, such as a data breach impacting local stakeholders or operational disruptions affecting services to the community. In such cases, appropriate regulatory bodies and directly affected parties shall be informed.

For capacity or transmission emergencies, community notification is not typically required unless the event could result in a service disruption or pose safety risks to the public. If necessary, notifications will be made through utility or energy sector communication channels to inform affected stakeholders and coordinate responses.

In all scenarios, the Project shall ensure that communication aligns with legal and regulatory requirements to protect public safety and maintain transparency. When necessary, the site manager will ensure that all necessary parties, including nearby residents, are contacted so they can safely evacuate. Refer to the Emergency Response Plan in **Appendix 2, Exhibit A-1.9** and the Fire Response Plan in **Appendix 2, Exhibit A-1.10**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

6. An identification of potential approach and departure routes to and from the facility site for police, fire, ambulance, and other emergency vehicles.

Acceleration Solar will notify local emergency services prior to construction so that they can visit the Project during construction to obtain an on-the-ground understanding of the Project layout, access points, and protocols in place. Access and egress roads that can be utilized by emergency vehicles are identified on the Proposed Conditions within the Site Plan found in **Appendix 2, Exhibit A-1.1 and Proposed Access Road Locations within the ERP in Appendix 2, Exhibit A-1.9** of this Application. Refer to Summary of Agency Consultations in **Appendix 2, Exhibit A-4.4** for summary of attempted coordination with Leslie Fire Department and Mason Fire Department. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

7. A commitment to review and update the ERP with fire departments, first responders, and county emergency managers at least once every 3 years.

Acceleration Solar is committed to reviewing and updating the ERP with fire departments, first responders, and county emergency managers at least once every 3 years. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 19-19.

8. An analysis of whether plans to be implemented in response to an emergency can be fulfilled by existing local emergency response capacity, and identification of any specific equipment or training deficiencies in local emergency response capacity.

The typical operations of the Project will not create nuisance or safety hazards due to dust, noise, smell, vibration, smoke, or lighting. Inspections and preventative maintenance are performed consistent with industry practice and manufacturer recommendations, including installation methods based upon existing site conditions and materials used. Consequently, the Project is not expected to require additional local emergency resources. Acceleration Solar will coordinate with local emergency services to provide site orientation and familiarize them with access and safety protocols prior to construction, confirming existing local capacity can effectively support emergency response needs. Site-specific training and resources will be provided to local emergency services before construction begins and annually during the Project's operation. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

9. Other information the applicant finds relevant.

Acceleration Solar will notify the Project's personnel, emergency services, appropriate stakeholders, and the surrounding community as necessary if additional emergency response planning measures become relevant. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

A-1.9.(b) – Changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing must be analyzed to determine if changes are necessary to the ERP. Additional consultation with local fire departments, first responders, and county emergency managers is required for amended plans.

If the Project's design, type, or manufacturer of facilities and equipment changes after the initial filing, Acceleration Solar is committed to analyzing the ERP for any necessary updates and consulting with local fire departments, first responders, and county emergency managers regarding any amended emergency response protocols.

EXHIBIT A-1.10 – FIRE RESPONSE PLAN (FRP)

A-1.10.(a) – The FRP shall include the following:

1. Evidence of consultation or a good-faith effort to consult with local fire department representatives to ensure that the FRP is in alignment with acceptable operating procedures, capabilities, resources, etc. If consultation with local fire department representatives is not possible, provide evidence of consultation or a good-faith effort to consult with the State Fire Marshal or other local emergency manager.

The Project is designed to promote fire safety during construction and operation in accordance with applicable township, county, state, and federal requirements, as well as industry best practices. Acceleration Solar has provided technical information and resources to the local fire department to ensure they are equipped to respond to emergencies, if needed. Acceleration Solar contacted the Leslie Fire Department and Mason Fire Department on 02/14/2025 and 03/14/2025. As of the time of this Application, no response has been received. Acceleration Solar contacted the Ingham County Sheriff's Department and met with Andy Denzer, the captain, and Bob Boerkoel, the Emergency Manager, on February 27, 2025 at 8:30-9:30 AM to review the Project's Emergency Response Plan. The Applicant hopes to work alongside the Leslie Fire Department and Mason Fire Department to develop the Fire Response Plan. Refer to the Fire Response Plan in **Appendix 2, Exhibit A-1.10** and Summary of Agency Consultations

in **Appendix 2, Exhibit A-4.4**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19

2. A description of all on-site equipment and systems to be provided to prevent or handle fire emergencies.

Acceleration Solar will continue to work with the local fire department to provide any necessary safety equipment and annual training necessary to ensure prevention and proper action in fire emergencies, including the following:

ON-SITE EQUIPMENT

The Project will be equipped with appropriate fire prevention and response systems to address potential fire emergencies. This includes the provision of one fire extinguisher in each site vehicle, one fire extinguisher in the substation control house, and one to two fire extinguishers inside the operations and maintenance (O&M) building, designed to extinguish small or incipient fires effectively. In addition, smoke detectors will be located within the substation control house and O&M building. These measures ensure the safety of personnel and property by facilitating prompt and efficient fire response on-site.

For any situation in which on-site fire response equipment proves insufficient, O&M staff will coordinate with local first responders to safely address potential fire emergencies. Gravel access roads are proposed within the facility footprint to provide access to key electrical equipment and disconnect devices. A fence surrounds the entire site and includes controlled access gates that will have a fire/utility approved Knox Box and signage showing emergency contact number.

During construction and normal operational activities, proper Personal Protective Equipment (PPE) must be worn at all times. PPE requirements may change due to onsite activities. Always check with the Acceleration Solar local O&M team before entering the Project during operations.

Fire protection is provided by the Leslie Fire Department, a volunteer fire department that provides fire protection to portions of Ingham County. Fire protection is also provided by the Mason Fire Department, which provides fire protection for the City of Mason, Aurelius Township, Vevay Township, and a portion of Alaiedon Township.

For more information, see also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-19.

3. A description of all contingency plans to be implemented in response to the occurrence of a fire emergency.

In response to a fire emergency, the Project has detailed contingency plans to protect personnel, mitigate risks to the environment, and minimize equipment damage. Upon discovering a fire, personnel are trained to evaluate whether the fire is in its incipient stage. If the fire can be safely controlled with a single portable fire extinguisher and the individual perceives an adequate level of safety, they may attempt to extinguish the fire. For fires beyond this stage, personnel are instructed to evacuate immediately to the designated muster location and notify the site manager. The site manager will coordinate the response and contact local fire rescue, emergency services, or HAZMAT teams as needed.

The site manager shall designate personnel to escort first responders to the fire location and provide critical information about site-specific risks, including the presence of hazardous chemicals, fuels, electrical sources, and other equipment. These escorts ensure responders are fully briefed on the fire classification (e.g., Class A, B, C, D, or K) and the potential hazards they may encounter. Meanwhile, all other personnel must remain at the muster location until an "all clear" signal is issued to ensure accountability and safety.

Acceleration Solar will continue to work with the local fire department to provide any necessary safety equipment and annual training necessary to ensure prevention and proper action in fire emergencies, including the following:

NOTIFICATION OF FIRE PERSONNEL

In the event of a fire, all personnel must immediately notify the on-site O&M manager or lead technician. Emergency services, including local fire departments, will be contacted promptly using pre-designated communication protocols. Access points and site-specific information, such as high-risk areas, will be provided to responding fire personnel to facilitate an efficient response.

STAFF AND VISITOR TRAINING

Comprehensive fire safety training will be provided to staff annually, covering fire prevention, proper use of extinguishers, evacuation procedures, and communication protocols. Visitors and contractors will receive site-specific fire safety briefings during orientation. Regular fire drills will be conducted to ensure readiness and familiarity with evacuation routes and safety measures.

VEGETATION MANAGEMENT

Vegetation under and around photovoltaic panels will be maintained to minimize fire risks. This includes routine trimming of grass and removal of dry foliage or combustible materials. Any debris accumulation will be promptly cleared to prevent potential ignition sources.

EMERGENCY EVACUATION PROCEDURES

Clear evacuation routes and assembly points will be identified and communicated to all personnel and visitors. Evacuation maps will be posted at key locations, and personnel will be instructed to use the nearest safe exit during an emergency. Designated leaders will account for all individuals at assembly points.

FIRE SUPPRESSION EQUIPMENT MAINTENANCE AND OPERATION

Equipment will be inspected regularly to ensure functionality. Only trained personnel will operate fire suppression equipment during emergencies.

COORDINATION WITH LOCAL EMERGENCY SERVICES

Acceleration Solar will maintain active communication and coordination with local fire departments and emergency responders. Regular meetings and site tours will familiarize them with the layout, high-risk areas, and fire suppression resources.

POST-FIRE RECOVERY AND REPORTING

After a fire, a thorough inspection of the affected area will be conducted to identify damages, determine the cause, and assess safety risks. A detailed incident report will be prepared, and corrective actions will be implemented to prevent recurrence. All affected systems and equipment will be repaired or replaced to restore operational safety.

By implementing these fire contingency measures, the Project ensures a proactive and organized approach to fire prevention and emergency response, safeguarding personnel, property, and the surrounding community.

4. For energy storage projects, a commitment to offer to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and at least once per year while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.

The proposed Project is not an energy storage facility and thus the standards for approval in Exhibit A-1.10.a.4 do not apply.

5. For wind and solar projects, a commitment to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and upon request while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.

Acceleration Solar will notify relevant emergency response agencies and fire departments having jurisdiction of the Project area prior to construction so that the Fire Department can visit the Project during construction to obtain an on-the-ground understanding of the Project layout, access points, and protocols in place. Furthermore, Acceleration Solar will supply additional equipment to support the local departments if necessary. Acceleration Solar commits to conducting, or providing funding to conduct, site-specific training drills with emergency responders prior to the commencement of construction and upon request while the facility is in operation to, among other things, familiarize local fire departments with the Project, hazards, procedures, and current best practices.**6. A commitment to review and update the FRP with fire departments, first responders, and county emergency managers at least once every 3 years.**

Acceleration Solar is committed to reviewing and updating the FRP with fire departments, first responders, and county emergency managers at least once every 3 years.

7. An analysis of whether plans to be implemented in response to a fire emergency can be fulfilled by existing local emergency response capacity. The analysis should include identification of any specific equipment or training deficiencies in local emergency response capacity and recommendations for measures to mitigate deficiencies.

The Project is designed to include 14-foot access roads to allow access for emergency vehicles in the unlikely event of a fire. Acceleration Solar does not anticipate requiring additional resources from local emergency responders. In addition, Acceleration Solar will coordinate with local emergency services to provide site orientation and familiarize them with access and safety protocols prior to construction, confirming existing local capacity can effectively support emergency response needs.

8. Other information the applicants find relevant.

Acceleration Solar will notify the Project's personnel, emergency services, appropriate stakeholders, and the surrounding community as necessary if additional fire response planning measures become relevant.

A-1.10.(b) – Changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing must be analyzed to determine if changes are necessary to the FRP. Additional consultation with local fire departments, first responders, and county emergency managers is required for amended plans.

If the Project's design, type, or manufacturer of facilities and equipment changes after the initial filing, Acceleration Solar is committed to analyzing the FRP for any necessary updates and consulting with local fire departments, first responders, and county emergency managers regarding any amended emergency response protocols. Refer to Fire Response Plan provided in **Appendix 2, Exhibit A-1.10**. See also **Appendix 3, Exhibit B-2, Direct Testimony of E. Schenk**, at pp. 15-16.

EXHIBIT A-1.11 – COMMISSIONING PLAN (FACILITIES WITH STORAGE ONLY)

A-1.11.(a) – For energy storage projects, provide a Commissioning Plan in compliance with NFPA 855 (4.2.4 & 6.1.3.2).

The proposed Project is not an energy storage facility and thus the standards in Exhibit A-1.11 do not apply.

EXHIBIT A-1.12 – EMERGENCY OPERATIONS PLAN (FACILITIES WITH STORAGE ONLY)

A-1.12.(a) – For energy storage projects, provide an Emergency Operations Plan in compliance with NFPA 855 (4.3.2.1.4).

The proposed Project is not an energy storage facility and thus the standards in Exhibit A-1.12 do not apply.

EXHIBIT A-1.13 – HAZARD MITIGATION ANALYSIS (FACILITIES WITH STORAGE ONLY)

A-1.13.a – For energy storage projects provide a Hazard Mitigation Analysis in compliance with NFPA 855 (4.4).

The proposed Project is not an energy storage facility and thus the standards in Exhibit A-1.13 do not apply.

EXHIBIT A-1.14 – UNANTICIPATED DISCOVERIES PLAN

A-1.14.(a) – Submit an Unanticipated Discoveries Plan (UDP) that addresses the anticipated impacts and plans to mitigate impacts to the environment and natural resources, including, but not limited to, sensitive habitats and waterways, wetlands and floodplains, wildlife corridors, parks, historic and cultural sites, and threatened or endangered species. The UDP must include:

1. A set of procedures to be followed if cultural resources are discovered. Examples of cultural materials include, but are not limited to, the following:

- i. An accumulation of shell, burned rocks, or other food-related materials**
- ii. Bones or small pieces of bone**
- iii. An area of charcoal or very dark stained soil with artifacts**
- iv. Stone tools or waste flakes (i.e., an arrowhead, or stone chips)**
- v. Clusters of tin cans or bottles**
- vi. Logging or agricultural equipment that appears to be older than 50 years**
- vii. Buried railroad tracks, decking, or other industrial materials**

3. A set of procedures to be followed if human remains are discovered.

4. A contact list that includes the following:

- i. Contact for the State Historic Preservation Office**
- ii. Contacts for Tribal Historic Preservation Offices of Michigan**
- iii. Local, project-specific, emergency contacts (i.e., County Sheriff, County Medical Examiner.)**

The Project has prepared an Unanticipated Discoveries Plan that includes a set of procedures to be followed in the event cultural resources or human remains are discovered and a relevant contact info. The plan also discusses procedure in the event that unanticipated natural resources are discovered including wetlands, waterways, floodplains, wildlife corridors, parks, historic and cultural sites, and threatened and endangered species. Refer to the Unanticipated Discoveries Plan in **Appendix 2, Exhibit A-1.14 and Environmental Compliance Report in Appendix 2, Exhibit A-6.2**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 16-17.

EXHIBIT A-1.15 – PARTICIPATING PARCEL LIST

A-1.15.(a) – Provide a list of all parcels that are participating or adjacent to the proposed facilities, including land-owner information for each parcel. Landowner information may be redacted and filed confidentially pursuant to protective order at the discretion of the applicant if the land-owner information is not available publicly.

A list of all parcels participating in or adjacent to the proposed Project has been prepared and is available in the Participating Parcel List in **Appendix 2, Exhibit A-1.15**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 4-7.

EXHIBIT A-1.16 – COMPLAINT RESOLUTION PROCESS

A-1.16.(a) – Provide a complaint resolution process for the site. The complaint process should include:

- 1. The name of a designated applicant representative provided with the authority to resolve local complaints.**
- 2. A dedicated phone number for complaints.**
- 3. An email address for complaints.**
- 4. Website information instructing the public on the complaint resolution process.**
- 5. Procedures for regular reporting of complaints received and how each complaint was resolved to be filed on a periodic basis in the docket.**

A Complaint Resolution Process for the site has been established and is detailed in **Appendix 2, Exhibit A-1.16**. This process will include a designated applicant representative authorized to address local complaints, along with a dedicated phone number and email address for submitting complaints. Additionally, website information is provided to guide the public on how to use the complaint resolution process. Procedures are in place for periodic reporting of complaints received and their resolutions, which will be filed periodically in the docket. A summary of complaints and their resolutions will be compiled and submitted in the MPSC docket on a quarterly basis, if complaints are received.

For more information, see also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 18-19.

III. EXHIBIT A-2: PROJECT DESCRIPTION

A-2.(a) – The Project Description shall include the following information:

- 1. Complete name, address, and phone number of the applicant and representative for the application.**

The applicant and representative for this solar energy facility siting certificate application is Brady Friss from Acceleration Solar, LLC (Acceleration Solar).

Address:
320 N. Sangamon Street, Suite 1025
Chicago, IL 60607

Phone:
(734) 680-3556

- 2. A description of the facility, including the following:**

- i. General description of size, purpose, and location.**

The Project is a proposed 90-MW solar facility. The Project will utilize approximately 618 acres of fenced-in area located on approximately 873 acres of participating land (Project Area) within Leslie, Vevay, and Onondaga townships, Ingham County, Michigan. The Project Area was selected based on land use, interest from landowners, and proximity to existing electrical grid infrastructure. Refer to the Site Plan located in **Appendix 2, Exhibit A-1.1** and the Participating

Parcel List in **Appendix 2, Exhibit A-1.15**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 4-7.

ii. General description of the community where the facility will be located (i.e. land use, population).

The Project Area is located within Leslie, Vevay, and Onondaga townships in Ingham County, Michigan. Leslie, Vevay, and Onondaga townships are relatively rural, farming-focused communities. According to 2020 census data, 2,305 people live within Leslie Township. Of the employed population in Leslie Township approximately, 16% work in the educational services, health care, and social assistance industry, 13.2% work in the retail trade industry, 12.8% work in the professional, scientific, management, administrative, and waste management industry, 12% work in the construction industry, 11.2% work in the manufacturing industry, 9% work in the arts, entertainment, recreation, accommodation, and food services industry, 7.3% work in the transportation, warehousing, and utilities industry, 6.9% work in the public administration industry, 5% work in the finance, insurance, real estate, rental, and leasing industry, and 4.4% work in Other industries.

Approximately 3,606 people live within Vevay Township. Of the employed population in Vevay Township approximately 36.8% work in the educational services, health care, and social assistance industry, 14.9% work in the arts, entertainment, recreation, accommodation, and food services industry, 8.1% work in construction, 7.7% work in the professional, scientific, management, administrative, a waste management services industry, 5.7% work in the transportation, warehousing, and utilities industry, 5.2% work in the manufacturing industry, 5.2% work in the retail trade industry, 5.2% work in the finance, insurance, real estate, rental, and leasing industry, 4.6% work in Other industries, and 2.8% work in the public administration industry.

Approximately 2,997 people live within Onondaga Township. Of the employed population in Onondaga Township approximately 28.1% work in the manufacturing industry, 11.8% work in the construction industry, 11.1% work in the educational services, health care, and social assistance industry, 9% work in Other industries, 7.1% work in the finance, insurance, real estate, rental, and leasing industry, 6.6% work in the professional, scientific, management, administrative, and waste management services industry, 5.8% work in the public administration industry, 5.5% work in the arts, entertainment, recreation, accommodation, and food services industry, 5% work in the retail trade industry, and 4.3% work in the transportation, warehousing, and utilities industry.

Aerial imagery indicates that the Project Area is located within a relatively rural and agricultural landscape with forested land as the majority land use. Other land cover types near and directly adjacent to the Project Area include residential, agricultural, and commercial structures, watercourses, agricultural fields, woodlots, and transmission structures. Review of the National Land Cover Database (NLCD) identified that the Project Area land cover includes approximately 90% cultivated crops, 6% deciduous forest, 2% of low intensity development, 1% woody wetlands, and less than one percent developed, open space, developed, medium intensity, hay/pasture, emergent herbaceous wetlands, and developed, high intensity.

See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 7-8.

iii. The percentage of land within the township, city, or village dedicated to energy generation at the time of the application. In addition, the percentage of land within the county dedicated to energy generation at the time of the application.

Ingham County ranks 17th out of 66 Michigan counties in total annual net electricity generation, producing approximately 801.22 gigawatt-hours (GWh) annually. The primary facilities contributing to this generation are two natural gas energy facilities, Lansing BWL REO Town Plant,

T B Simon Power Plant, and three solar energy facilities, Blue Elk II Solar, LLC, Blue Elk III Solar, LLC, and Spartan PV 1, LLC, all located within the County. Lansing BWL REO Town Plant, owned by Lansing Board of Water and Light, generates 539.2 GWh annually, and began operations in July 2013. T B Simon Power Plant, owned by Michigan State University, generates 249 GWh annually, and has been in operation since December 1965. Spartan PV 1, LLC, owned by NJR Clean Energy Ventures Corporation, generates 12.6 GWh annually, and has been in operation since 2017. Blue Elk III Solar, LLC, owned by Blue Elk III Solar, LLC, generates 433 MWh annually, and has been in operation since 2023. Blue Elk II Solar, LLC, owned by Blue Elk II Solar, LLC, did not have readily available information for annual generation.

At the time of this application, a summary of energy generation within Ingham County is as follows:

- Leslie Township:
 - Approximately 228 acres of land associated with Blue Elk II Solar is located within Leslie Township. This totals about 1.01% of land within the Township.
- Aurelius Township:
 - Approximately 109 acres of land associated with Blue Elk III Solar is located within Aurelius Township. This totals about .47% of land within the Township.
- City of East Lansing:
 - Approximately 135 acres of land associated with Spartan PV 1 and T B Simon Power Plant is located with the City of East Lansing. This totals about 1.55% of the land within the City.
- City of Lansing:
 - Approximately 11 acres of land associated with Lansing Board of Water and Light is located within the City of Lansing. This totals approximately 0.04% of the land within the City.

In summary, based on data from publicly available databases, approximately 482 acres of land is currently dedicated to energy generation in Ingham County, which totals approximately .13%.

See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 8-10.

iv. Expected use.

The Project will consist of solar panels and inverters arranged in photovoltaic (PV) arrays. Associated facilities include the Project substation, overhead transmission line to point-of-interconnection, underground electrical cables to collect the generated power and transmit it to the Project substation, perimeter fencing, and gravel access roads to each PV array. The proposed locations of the solar arrays, substation, collection lines, access roads, and other Project facilities are shown in the Site Plan in **Appendix 2, Exhibit A-1.1**.

The maximum height of the solar arrays, and other collection devices, components, or buildings of the Commercial Solar Energy System, excluding substation and electrical transmission equipment, have been designed not to exceed 25 feet in height when oriented at maximum tilt (as measured from the natural grade at the base of improvements) at any time or location on the property. Signage for the Project will be limited to safety and contact information to provide the public with general information related to the facility and will be installed at all gates and other points of ingress and egress. Project signage will include the manufacturer or installer's

identification, appropriate warning signs, emergency contact information, operator contact information, and complaint resolution information.

The solar arrays will be mounted on piles, minimizing disturbance to the land. Grasses and other vegetation will be allowed to grow underneath and between panels and will be maintained against overgrowth. Giving soil rest can help maintain soil quality and contribute to biodiversity of agricultural land to increase nutrient levels and enable the land to revert back to agricultural uses at the end of the operational life for solar installations. The Project is designed and will be planted to achieve a score of at least 76 on the Michigan Pollinator Habitat Planning Scorecard for Solar Sites developed by the Michigan State University Department of Entomology, or any applicable successor standards approved by the Commission. Native, weed-free grass seed mixtures and pollinator blends will be planted on-site after completion of construction. Landscape buffering will be included at the request of non-participating landowners adjacent to the Project in areas with a viewshed that is not already obstructed by existing vegetation.

See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 10-11.

IV. EXHIBIT A-3: PROJECT SCHEDULE

A-3.(a) – The application shall include expert witness testimony and exhibits presenting the following information:

- 1. Detailed schedule of planned construction activities including planned construction start date and expected duration of construction.**

The proposed Project’s planned construction activities, once approved, are anticipated to begin in the first quarter of 2027. Construction is expected to take approximately 1.25 years, with the anticipated completion date in the second quarter of 2028. A more detailed breakdown of the Project’s development stages from establishment of the electrical queue position to commercial operation date is included below.

Acceleration Solar Development and Construction Schedule

Milestone	Date	Status
Queue Position Established	2Q 2019	Complete
Site Control Completed	2Q 2019	Complete
Environmental Studies Complete	4Q 2022	Complete
Technical Studies Complete	4Q 2022	Complete
Interconnection Agreement Executed	4Q 2022	Complete
Discretionary Permits Secured	2Q 2026	Expected
Financing Secured	1Q 2027	Expected
EPC Contract Executed	1Q 2027	Expected
Construction Start	1Q 2027	Expected
Pile Installation	2Q-3Q 2027	Expected

Electrical Underground	1Q-3Q 2027	Expected
Tracker Installation	2Q-3Q 2027	Expected
Module Installation	2Q-3Q 2027	Expected
Delivery & Installation of Main Power Transformer	2Q 2027	Expected
Energization for Interconnection	2Q-3Q 2027	Expected
Commissioning & Regulatory Testing	3Q-4Q 2027	Expected
Commercial Operation Date	2Q 2028	Expected

2. Testimony describing each element within the construction schedule.

Aileen Kenney of DESRI has provided testimony that describes each element within the construction schedule. Expert testimony describing the proposed construction schedule is included in **Appendix 2, Exhibit A-3**. See also **Appendix 3, Exhibit B-3**, Direct Testimony of A. Kenney, at pp. 6-11.

V. EXHIBIT A-4.1 THROUGH A-4.5: LOCAL OUTREACH

A-4.(a) – The following local outreach documentation is to be provided:

EXHIBIT A-4.1 – CHIEF ELECTED OFFICIAL DOCUMENTATION

- i. A copy of applicant’s offer to meet with the chief elected official in each ALU.**
- ii. Documentation of the chief elected official response(s) to the meeting request if provided.**
- iii. A summary of all meetings, including meeting.**

Acceleration Solar has made formal offers to meet with the chief elected officials in each affected local unit (ALU) to discuss the proposed Project and its implications for the community. The ALUs contacted include Leslie, Vevay, and Onondaga townships. The meeting invitations sent on December 17th and 18th, 2024, were not limited in scope and included opportunities for discussion of community benefits, project timelines, opportunities for collaboration, and anything else of interest to the ALU. Refer to Chief Elected Official in **Appendix 2, Exhibit A-4.1** for a copy of the offers to meet with the legislative body of the ALU. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 12-15.

Acceleration Solar conducted a voluntary meeting with all three ALU’s on March 4, 2025, to discuss the Site Plan, propose Host Community Agreements, and answer any questions. Additional details on the voluntary meeting can be seen as follows:

ALUs #1/#2/#3:

- Date: March 4, 2025
- Location: Leslie Town Hall (4279 Oak Street, Leslie, MI 49251)
- Attendees:
 - Acceleration Solar (“Ranger”) Attendees: Brady Friss and Sean Harris

- Vevay Supervisor: John Lazet
- Vevay Counsel: David M. Revore
- Onondaga Supervisor: Phil Hutchinson
- Leslie Supervisor: Dallas Henney
- Onondaga/Leslie Counsel: Kyle O’Shea and Lindsey Gergel
- Key Discussion Points:
 - Project overview
 - Permitting process and application timeline
 - Agency outreach
 - Site design questions
 - Public meeting logistics
 - PILT vs. Ad-Valorum structure
 - Host community agreement discussion

Acceleration Solar is committed to engaging with local officials and fostering a collaborative dialogue throughout the Project development process.

EXHIBIT A-4.2 – SUMMARY OF COMMUNITY OUTREACH AND EDUCATION EFFORTS

Provide a summary including a copy of all presentation or education materials, number of attendees for any public meetings or meetings with elected officials, meeting length, number of commenters and topics discussed during the meetings.

i. Outreach conducted to locally impacted community groups, environmental organizations, and labor union representatives. Include, at a minimum, the date and time the outreach took place, who participated in the consultation, and summary of findings.

Acceleration Solar has compiled a summary of community outreach efforts regarding the proposed Project. The documentation includes details of all public meetings and presentations conducted as part of the engagement process. This documentation underscores Acceleration Solar’s commitment to transparent communication and collaboration with all stakeholders throughout the Project development process. Refer to the Summary of Community Outreach and Education Efforts in **Appendix 2, Exhibit A-4.2** that includes a detailed summary of the township public meetings and copies of materials on display. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 15-18.

Township public meetings summary:

Onondaga Township Public Meeting:

- Date: April 23, 2025
- Location: Onondaga Town Hall
- Number of Attendees: 26
- Meeting Length: 1 Hour 24 Minutes
- Number of Commenters: 3
- Topics Discussed: Ranger Power presentation of Project, public comments, and Q&A period. Refer to **Appendix 2, Exhibit A-4.2** for details of public meeting and transcription. Summary of public comments is included in **Appendix 2, Exhibit A-4.3**.

Leslie and Vevay Townships Joint Public Meeting:

- Date: April 24, 2025
- Location: Leslie Township Hall
- Number of Attendees: 55
- Meeting Length: 2 Hours 27 Minutes
- Number of Commenters: 17
- Topics Discussed: Ranger Power presentation of Project, public comments, and Q&A period. Refer to **Appendix 2, Exhibit A-4.2** for details of public meeting and transcription. Summary of public comments is included in **Appendix 2, Exhibit A-4.3**.

In addition to public meetings, Acceleration Solar conducted outreach to locally impacted community members to ensure their voices were heard. This outreach began occurring in September 2022 and is ongoing at the time of submission of this Application. Participants included:

- Leslie Township
 - Timeline of Outreach: November 2022 - Current
 - Initial Contact: Dallas Henney, Township Supervisor
- Vevay Township
 - Timeline of Outreach: September 2022 - Current
 - Initial Contact: John Lazet, Township Supervisor
- Onondaga Township
 - Timeline of Outreach: October 2024 - Current
 - Initial Contact: Phil Hutchison, Township Supervisor
- Adjacent Project Neighbors
 - Timeline of Outreach: March 2025 - Current
 - Initial Contacts: 23 Adjacent Project Neighbors

Acceleration Solar has also conducted an introductory meeting with the Sierra Club on August 5, 2025, from 2:30-3:00PM EST to discuss the Project. To date, no additional outreach has taken place with other community groups, environmental organizations, or labor union representatives. Acceleration Solar remains committed to meeting with additional impacted groups and sharing information on the Project. Further outreach will be ongoing throughout the life of the project.

Refer to the Summary of Community Outreach and Education Efforts in Appendix 2, Exhibit A-4.2 that includes a detailed summary of each participant as well as coordination and shared materials. Attendees at the public meeting represented a cross-section of the community, with individuals representing themselves, community groups, and environmental interests.

Acceleration Solar will enter into a Project Labor Agreement with one or more labor organizations prior to the commencement of construction. Refer to Local Job Creation in Appendix 2, Exhibit A-8.4 that includes DESRI's Letter of Intent. Acceleration Solar will provide the Commission with a copy of the Project Labor Agreement once finalized.

For more information, see also Appendix 3, Exhibit B-1, Direct Testimony of S. Harris, at pp. 12-18.

EXHIBIT A-4.3 – ACCOMODATIONS OR CHANGES

Accommodations or changes made to the project design to address the public comments received.

Exhibit A-4.3, in Appendix 2, includes a summary of the accommodations, changes, and commitments made by Acceleration Solar following public comments received. In addition, this exhibit contains all written public

comments received by Acceleration Solar prior to submission of this Application. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at p. 18.

EXHIBIT A-4.4 – SUMMARY OF AGENCY CONSULTATIONS

Summary of Agency Consultations. Provide a summary for each federal, state and local agency consultation that includes, at a minimum: the date and time the consultation took place; who participated in the consultation; and copies of correspondence listing necessary permits, next steps, and associated timeline. Provide a justification for any consultations the applicant deemed not necessary.

- i. Federal agencies – where applicable.
- ii. Michigan Department of Natural Resources.
- iii. State Historic Preservation Office.
- iv. Michigan Department of Environment, Great Lakes, and Energy.
- v. Michigan Department of Agriculture and Rural Development.
- vi. County Drain Commission.
- vii. County Road Agency.
- viii. Owners of major facilities for electric, gas, or telecommunications lines.
- ix. Michigan Department of Transportation – Aeronautics Commission (if applicable).

Exhibit A-4.4, in **Appendix 2**, includes a table which provides a comprehensive summary of consultations conducted with various federal, state, and local agencies as part of the Project development process. Each entry details the date and time of the consultation, the participants involved, and a summary of the correspondence exchanged, which outlines necessary permits, next steps, and associated timelines. Additionally, justifications for any consultations that were deemed unnecessary are included where appropriate. This summary demonstrates Acceleration Solar’s commitment to engaging with relevant agencies to ensure compliance with regulatory requirements and to facilitate a transparent and collaborative project execution. Proof of agency consultation has been included in **Appendix 2, Exhibit A-4.4**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 19; **Appendix 3, Exhibit B-4**, Direct Testimony of C. Kantola, at pp. 3-5.

EXHIBIT A-4.5 – SUMMARY OF TRIBAL ENGAGEMENT

A summary of tribal engagement, including at a minimum, the communication and outreach conducted with each Tribe, date and time, who participated, and a summary of tribal input and outcomes if applicable.

Exhibit A-4.5, in **Appendix 2**, includes a table which provides a detailed summary of Acceleration Solar’s engagement efforts with local tribes. Each entry outlines the most recent communication with the respective tribe, including the date and time of the interaction, the participants involved, and a summary of the tribal input received along with any relevant outcomes. This summary underscores Acceleration Solar’s commitment to fostering respectful and meaningful dialogue with tribal communities, ensuring their perspectives are considered in the Project development process. Through these engagements, Acceleration Solar aims to build strong relationships and address any concerns that may arise. A Summary of Tribal Engagement has been included in **Appendix 2, Exhibit A-4.5**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 19.

VI. EXHIBIT A-5: NFPA COMPLIANCE (FACILITIES WITH ENERGY STORAGE ONLY)

A-5.(a) – Provide documentation that the energy storage facility complies with the version of National Fire Protection Association (NFPA) 855 “Standard for the Installation of Stationary Energy Storage Systems” in effect on November 29, 2024 or as adopted by the Commission.

The proposed Project is not an energy storage facility and thus the standards in Exhibit A-5 do not apply.

VII. EXHIBIT A-6.1 THROUGH A-6.4: ENVIRONMENTAL COMPLIANCE

A-6.(a) – Exhibits A-6.1 through A-6.4 are designed to demonstrate compliance with applicable state and federal environmental laws. Below is a list of the sub exhibits.

EXHIBIT A-6.1 – SOIL AND ECONOMIC SURVEY REPORT

Acceleration Solar requested soil and economic survey data for Ingham County be provided by Ingham County and United States Department of Agriculture (USDA). Neither agency have provided a response before submission of this Application. In the absence of data provided, the Ingham County Soil and Economic Survey Report was reviewed to assess the soil and economic qualities of the proposed Project Area. A Custom Soil Resource Report has been generated for the Project Area and 1000-foot buffer as well as for the entire Ingham County. Refer to the Soil and Economic Survey Report available in **Appendix 2, Exhibit A-6.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 19-22.

EXHIBIT A-6.2 – ENVIRONMENTAL COMPLIANCE REPORT

This report describes how the proposed facility will comply with applicable state and federal laws, including the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, and Section 1705(2) of the Michigan Environmental Protection Act (MEPA), MCL 324.1705(2).

- i. Provide a description of the expected direct impacts of the proposed energy facility on the environment and natural resources and a plan describing how these impacts are proposed to be addressed and/or mitigated.**

As stated within the Environmental Compliance Report (ECR), Exhibit A-6.2, the Project selection process and design were carried out with the intent of avoiding direct environmental impacts across multiple areas of review (including wildlife, noise, water, etc.), with the result that there are materially few anticipated direct environmental and natural resources impacts. Direct impacts identified in the ECR relate to six non-regulated wetlands, which would require ground disturbance for the placement of panels or fencing, totaling approximately 5.62 acres. One indirect impact is likely to occur for the construction of an electrical line jack and bore of the stream in Onondaga Township. Any electrical line crossing of this stream will be bored underground to avoid direct impact to the physical stream channel or its functionality. In addition, tree clearing is typically not considered a direct impact to nearby water resources, such as the area around this stream, because it will not significantly alter the landscape or ecological function. When BMPs, such as erosion controls and buffer preservation are used, water quality and wildlife remain protected, and any minor disturbance is temporary and localized rather than having a lasting or widespread environmental effect. Initial discussions with state environmental regulators suggest that the impacts are so limited that no mitigation will be required. Refer to the Environmental Compliance Report available in **Appendix 2, Exhibit A-6.2** and Summary of Agency Consultation available in **Appendix 2, Exhibit A-4.4**.

The Applicant sited the Project to minimize the potential for the solar facility to impact habitat quality, minimize habitat fragmentation, and reduce disturbances to species that rely on forests, wetlands, herbaceous areas, and open space. Based on the current layout, the Project should not significantly impact wildlife because it predominantly uses previously disturbed or agricultural land, avoids large-scale habitat conversion, and incorporates mitigation strategies to reduce disturbance to the local wildlife to the maximum extent possible. Three existing forested areas containing wetland within the Project Area, located north of Plains Road, will be largely unimpacted. Based on Atwell's review, there are no wildlife corridors present within the Project Area. Both MDNR and USFWS have reviewed the proposed Project and neither expressed any concern for the development of the Project as long as recommended

construction BMPs were followed. Refer to the Environmental Compliance Report available in **Appendix 2, Exhibit A-6.2** and Summary of Agency Consultation available in **Appendix 2, Exhibit A-4.4**.

ii. Provide a statement and reasonable evidence that the proposed facility will not begin commercial operation until it complies with applicable state and federal environmental laws including NREPA.

Acceleration Solar is committed to adhering to all applicable state and federal laws, including the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, and Section 1705(2) of the Michigan Environmental Protection Act (MEPA), MCL 324.1705(2).

Acceleration Solar recognizes the importance of complying with all relevant environmental regulations before commencing operations. Acceleration Solar is committed to maintaining compliance and, as such, the proposed Project will not begin commercial operation until all applicable state and federal environmental laws, including NREPA, are met. This commitment is supported by evidence such as permit applications, environmental assessments (including the Environmental Compliance Report), and correspondence with regulatory agencies, which will be maintained throughout the Project development process. Refer to the Environmental Compliance Report available in **Appendix 2, Exhibit A-6.2**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 19-22.

EXHIBIT A-6.3 – PERMIT LIST AND STATUS

i. Provide a list of all permits necessary prior to construction with the information identified below:

- **Subject.**
- **Responsible Agency.**
- **Date or Proposed Date Application Submitted.**
- **Date Permit Issued or Expected to be Issued.**

ii. Include any permits received prior to filing an application in this exhibit.

The following table provides a comprehensive list of all permits necessary for the proposed Project prior to construction. It includes detailed information regarding each permit's subject, the responsible agency overseeing the issuance, and expected dates of submission and permit issuance. At the time of submitting this Application, there are no permits issued to the Project. As permits are received for the Project, copies of issued permits will be provided to MPSC within an updated **Appendix 2, Exhibit A-6.3**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 21-22.

Subject	Responsible Agency	Date of Application Submission	Date of Permit Issuance
Part 301, Inland Lakes and Streams Permit; Part 303, Wetlands Protection Permit;; Notice of Coverage (NOC) National Pollutant Discharge Elimination System (NPDES) permit	Michigan Department of Environment, Great Lakes, and Energy	Q3 2026 Q4 2026	Q4 2026

Right-of-way Permit/Utility Permit; Driveway Permit; Haul Route Permit; Single Move/Extended Transportation Permit; Road Use Agreement	Ingham County Road Department	October 2026 October 2026 October 2026 October 2026 Q4 2026	Q1 2027
Soil Erosion and Sedimentation Control Permit; Drain Crossing Permit/Drain Connection (Tap-In) Permit, and Stormwater Management Plan Submission and Approval	Ingham County Drain Commission	Q4 2026	Q1 2027
Building Permit; Electrical Permit	Leslie Township	Q4 2026	Q1 2027
Building Permit	Vevay Township	Q4 2026	Q1 2027
Building Permit; Electrical Permit	Onondaga Township	Q4 2026	Q1 2027
Utility Crossing Agreement	Consumers Energy	Q2 2026	Q4 2026

EXHIBIT A-6.4 – STORMWATER MITIGATION PLAN

- i. Conduct a stormwater assessment and prepare a plan that describes measures to minimize, mitigate, and repair any drainage impacts. The assessment and plan may be preliminary.**
- ii. The Plan shall address any guidance from consultation with the county drain commissioner and shall include the 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.**

Acceleration Solar has conducted a comprehensive stormwater assessment that outlines measures to minimize, mitigate, and repair any potential drainage impacts associated with the proposed Project. This plan is designed to ensure effective management of stormwater runoff, incorporating best practices to protect the surrounding environment and natural resources. Refer to the Minimize, Mitigate, and Repair Plan in **Appendix 2, Exhibit A-1.3**. See also **Appendix 3, Exhibit B-4**, Direct Testimony of C. Kantola, at pp. 3-5.

The plan also addresses guidance obtained from consultations with the Ingham County Drain Commissioner. The consultations occurred on February 3, 2025 and February 20, 2025, with Ingham County Drain Commission representatives, Acceleration Solar representatives, and Atwell, LLC

representatives in attendance. Correspondence from this meeting, detailing necessary permits, next steps, and associated timelines, is included in **Appendix 2, Exhibit A-4.4** (Summary of Agency Consultations). For a complete overview of the stormwater mitigation measures and consultation outcomes, the Preliminary Stormwater Management Plan (including a Minimize, Mitigate and Repair (MMR) Plan) is available for review in **Appendix 2, Exhibit A-6.4**.

VIII. EXHIBIT A-7: SIGNAL MITIGATION PLAN

i. If the facility is reasonably expected to have an impact on television signals, microwave signals, agricultural global position systems, military defense radar, radio reception, or weather and doppler radio, provide a plan to minimize and mitigate that impact.

The Project has been designed to not interfere with electromagnetic fields or communications signals and therefore no mitigation measures are anticipated. Electromagnetic interference (EMI) is typically taken to mean radiofrequency emissions impacting nearby radio receivers but can also refer to interference with communication devices and navigational aids. The Federal Aviation Administration has indicated that EMI from photovoltaic installations such as solar arrays is a low risk (NREL 2017). Photovoltaic systems equipment such as transformers and electrical cables are not sources of electromagnetic interference because of their low frequency of operation. Photovoltaic panels themselves do not emit EMI, and photovoltaic inverters are inherently low-frequency devices that are not prone to radiating EMI. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 22.

ii. Wind turbine facilities should provide evidence of prior consultation with nearby communication tower operators, including those of the United States Defense Department.

The proposed Project is not a wind facility and thus the standards for approval in Exhibit A-7.ii do not apply.

IX. EXHIBIT A-8.1 THROUGH A-8.5: PUBLIC BENEFITS

A-8.(a) – Provide a description of the expected public benefits of the proposed energy facility, including, but not limited to, the list below. Explain how the public benefits of the proposed energy facility justify its construction.

EXHIBIT A-8.1 – TAX REVENUE

A primary benefit of the proposed Project will be the generation of substantial tax revenue, which will be paid to local taxing districts. This revenue is critical for funding essential services and is anticipated to contribute to community schools, public safety, infrastructure maintenance, and community development initiatives. To better understand the economic benefits associated with the Project, Acceleration Solar contracted Anderson Economic Group to prepare a Property Tax Impact Memorandum (“Memo”) to determine the property tax impact the project will have on local taxing jurisdictions, including Ingham County, Leslie Township, Vevay Township, Onondaga Township, local schools, fire and police services, and others. Based on the findings of this Memo, Acceleration Solar Estimates that the Project will generate \$25.6 million in personal property tax revenues over the next 40 years, with approximately \$2 million of that personal tax revenue generated in the Project’s first operational year. This revenue will support local schools, enhance public services, and improve infrastructure, ultimately benefiting residents and businesses in the area. The Tax Revenue Memorandum is available for review in **Appendix 2, Exhibit A-8.1**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 23-25.

EXHIBIT A-8.2 – PAYMENTS TO LANDOWNERS

These may be filed confidentially if provided to Staff pursuant to a confidentiality agreement that will be superseded by a protective order once one is entered.

The Applicant has acquired the rights to develop, construct, and operate an up to 90-MW alternating current solar project within ten parcels of land owned by four private landowners. These land rights are granted by easement agreements or by purchase option agreement. Payments will be provided to landowners of participating properties as part of the development of the proposed Project, which will provide the property owners with a stable income stream.

The expected payments to participating property owners are structured to reflect fair compensation for the use of their land while enabling them to maintain their agricultural or residential activities alongside the energy facility. This approach ensures that the proposed Project will operate in harmony with the local community while benefitting landowners. The payments not only benefit the individual property owners but also contribute to the overall economic quality of the community by supporting local households and encouraging reinvestment in the area.

Participating landowners in the Acceleration Solar Project have chosen voluntarily to include their property in the project through one of the following real estate arrangements: Easement Agreement, Purchase Option, or Transmission Facilities Easement. Each agreement includes varying economic terms.

The most significant long-term payments to participating landowners are the Production Term Payments associated with Easement Agreements. The Acceleration Solar Project has solar panels sited within a fenced-in area of approximately 618 acres. The annual Production Term Payments to landowners is assessed based on the portion of the Property where solar panels have been sited. Payments to landowners can be found at **Appendix 2, Exhibit A-8.2-Confidential**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 20-21.

EXHIBIT A-8.3 – HOST COMMUNITY AND COMMUNITY BENEFITS AGREEMENTS

Provide signed copies of host community agreements (which includes a payment provision of \$2,000 per MW megawatt of nameplate capacity to the ALU upon commencement of operation) and/or community benefits agreements (which includes payment provisions as outlined in 6.2.10(a)(3)(ii) of this guidance).

i. Host community agreements or community benefits agreements are required for each ALU, according to the nameplate capacity located within the ALU.

- **If host community agreements are not signed after good-faith negotiations with an ALU, community benefit agreements may be entered into with one or more community-based organizations providing benefits within or serving the residents of each ALU without a signed host community agreement.**
- **In the event that agreements were proposed and were not signed, those may be provided in lieu of signed agreements with an explanation of why the proposed agreements have not yet been executed.**

ii. Community benefits agreements with community-based organizations within, or that serve residents of, the ALU, must include provisions for payments that are equal to, or greater than, what would have paid pursuant to a host community agreement. The topics and specific terms of the agreements may vary and may include, but are not limited to, any of the following:

- **Workforce development, job quality, and job access provisions that include, but are not limited to, any of the following:**
 - o **Terms of employment, such as wages and benefits, employment status, workplace health and safety, scheduling, and career advancement opportunities.**

o Worker recruitment, screening, and hiring strategies and practices, targeted hiring planning and execution, investment in workforce training and education, and worker input and representation in decision making affecting employment and training.

- **Funding for or providing specific environmental benefits.**
- **Funding for or providing specific community improvements or amenities, such as park and playground equipment, urban greening, enhanced safety crossings, paving roads, and bike paths.**
- **Annual contributions to a nonprofit or community-based organization that awards grants.**

Acceleration Solar discussed its intent to enter into Host Community Agreements with each Leslie, Vevay, and Onondaga Townships during the Project’s initial voluntary meeting with the Chief Elected Officials of each ALU on March 4, 2025. Following this meeting, Acceleration Solar proposed Host Community Agreements to the Chief Elected Official of each Affected Local Unit via email on March 10, 2025 at approximately 4:17PM Draft Host Community Agreements can be found at **Appendix 2, Exhibit A-8.3**.

In accordance with Public Act 233, each Host Community Agreement includes an express provision in the Recitals, which are incorporated by reference into the Agreement, as follows:

Acceleration Solar is willing to, as limited by this Agreement and in a manner consistent with Public Act 233 of 2023, pay to the Township \$2,000 per megawatt of nameplate capacity located within the Township (“Impact Fee”), which Impact Fee shall be used as determined by the Township for police, fire, public safety, or other infrastructure, or for other projects as determined by the Township, so long as such project(s) are legal and permissible under all applicable laws, ordinances, and regulations.

Further, Section II of each Host Community Agreement further reiterates this payment provision, providing: “Within 30 days of commencement of operation of the Project, Acceleration Solar shall pay to the Township an Impact Fee of \$2,000 per megawatt of nameplate capacity located within the Township.”

Acceleration currently estimates based on its submitted design that the Project’s proposed 90MW nameplate capacity is distributed between each ALU as follows: approximately 9% (8 MW) in Onondaga Township, approximately 39% (35 MW) in Vevay Township, and approximately 52% (47 MW) in Leslie Township. In light of the possibility of panel removal or relocation in or between one or more townships as a minor change, the proposed host community agreement—consistent with the statutory language in PA 233—contractually commits to payment of \$2,000 per megawatt of actual nameplate capacity (as finally approved and constructed) located in each township upon commencement of operation.

As of the time of filing this Application, Acceleration has not yet received feedback or signed Agreements from each ALU. Acceleration remains committed to engaging in good faith negotiations with each ALU involved in the Project regarding the host community agreements prior to the commencement of construction. However, if host community agreements are not signed after good-faith negotiations with the townships, community benefit agreements may be entered into with one or more community-based organizations providing benefits within or serving the residents of each ALU without a signed host community agreement. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 22-23.

EXHIBIT A-8.4 – LOCAL JOB CREATION

Provide a project labor agreement or collective bargaining agreement if applicable.

The Project will benefit the local, regional, and state economies by creating approximately 200 temporary jobs during construction and 3-5 full-time positions to support operations of the solar energy facility once operational. Acceleration Solar agrees to enter into a Project Labor Agreement or Collective Bargaining Agreement, as defined

under PA233 Sec. 221(u) and consistent with Sec. 226(7)(e)(iii), with one or more labor organizations prior to the commencement of construction. See Exhibit A-8.4, Letter of Intent.

Project Labor Agreements (PLA) and Collective Bargaining Agreements (CBA), as defined under PA233 Sec. 221(u) and consistent with Sec. 226(7)(e)(iii), are entered into between the direct employer of record and the relevant labor organizations. The direct employer of record for the construction and construction maintenance work to be performed is the EPC. Acceleration Solar has not selected an EPC at this time, and it is typical for EPC selection to occur shortly before the start of construction.

Acceleration Solar will ensure compliance with PA233 by including a PLA and/or CBA, as defined under PA233 Sec. 221(u) and consistent with Sec. 226(7)(e)(iii), requirement for all EPC and O&M firms bidding to provide services on the project. Additionally, Acceleration Solar will include the PLA and/or CBA, as defined under PA233 Sec. 221(u) and meeting all of the requirements of Sec. 221(u), in the EPC contract.

Prior to the commencement of construction, Acceleration Solar will provide the fully executed PLA and/or CBA, as defined under PA233 Sec.221(u), to the MPSC through docket number U-21932.

Acceleration Solar anticipates issuing a Request for Proposals (RFP) for EPC in Q4 2026 and EPC selection in Q1 2027.

Refer to Local Job Creation in **Appendix 2, Exhibit A-8.4** that includes DESRI's Letter of Intent. Acceleration Solar will provide the Commission with a copy of the Project Labor Agreement once finalized. See also **Appendix 2, Exhibit A-14 Conditions**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 23.

EXHIBIT A-8.5 – ENERGY NEEDS CONTRIBUTIONS

When applicable, contributions to meeting Michigan's identified energy, capacity, reliability, or resource adequacy needs such as approved Integrated Resource Plans and Renewable Energy Plans.

The Project will significantly contribute to Michigan's identified energy, capacity, reliability, and resource adequacy needs. Solar energy generation contributes to the stability and availability of energy resources within the state of Michigan, while promoting energy efficiency and community benefits that are brought upon by solar energy development. Unlike other energy generation facilities, solar energy facilities do not consume fuel and require less land than traditional power plant infrastructure. Michigan has set ambitious renewable energy goals, aiming for 50% renewable energy by 2030 and 60% by 2035. The ultimate goal is to achieve 100% clean energy statewide by 2040. This includes transitioning utility providers to 100% carbon-free energy generation by that year. Additionally, Acceleration Solar has committed to seeding the Project fenced-in areas with a mix of pollinator-friendly and other vegetation determined to be appropriate for the region that will be compatible with the surrounding landscape. The design and purpose of this Project aligns with Michigan's energy targets and works towards a more resilient power grid. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at pp. 25.

X. EXHIBIT A-9: FARMLAND PROTECTION

A-9.(a) – Provide an explanation for how the proposed facility will not unreasonably diminish farmland.

The land use of the proposed Project Area is currently primarily cultivated crops (90%). Approximately 15% of the Project Area is designated as prime farmland and 3% of the Project Area is designated as farmland of local importance. Acceleration Solar has committed to seeding the fenced-in areas of the Project with a mix of pollinator-friendly and other vegetation determined to be appropriate for the region. Establishment of regionally appropriate seed mixes will allow land within the Project previously used for agriculture to become fallow, optimizing soil health and creating the conditions to allow productive farmland to return to a traditional agricultural use after the operational life of the Project. Pollinator-friendly vegetation will decrease erosion, increase stormwater control, increase biodiversity, and maintain the character of the surrounding area. Refer to the Proposed Vegetation Management Plan included with the Site Plan in **Appendix 2, Exhibit A-1.1**. Individual

landowners participating in the Project have exercised their individual property rights to diversify their income streams by making their property available for agrivoltaic use for the duration of the Project instead of other possible uses. In some cases, landowners may elect to utilize payments received under land control agreements to enable investments or other improvements to their farming operations on other farmland not included within the Project Area. Further, the Project Area will be restored to a similar condition that exists today when the Project is ultimately decommissioned, allowing the land to be returned to traditional agricultural use, if desired by the landowner. As such, the proposed facility is not anticipated to unreasonably diminish farmland.

For more information, see also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk at pp. 22-23.

A-9.(b) – Provide the information below at both the local (township/city/village) and the county level using publicly available data, such as <https://croplandcros.scinet.usda.gov/>, as follows:

1. Type of farmland being utilized by the project (i.e. Standard, Prime, Specialty Crops).

The top crops currently grown within Ingham County include soybeans for beans, corn for grain, wheat for grain, forage (hay/haylage), and corn for silage/greenchop.

2. Total acreage of farmland utilized by the project.

According to the National Land Cover Dataset (NLCD), approximately 90% of the proposed Project Area, approximately 792 acres, is designated as cultivated crops land cover.

3. Farmland utilized by the project as a percentage of farmland in the township and county.

Leslie Township encompasses approximately 22,612 acres of land. While specific data on the exact amount of farmland within the township is not readily available, the area is predominantly agricultural, with a significant portion of its land dedicated to farming activities. As such, it is assumed that the Project Area will utilize less than 1% of the dedicated farmland within Leslie Township.

Vevay Township encompasses approximately 20,250 acres of land. While specific data on the exact amount of farmland within the township is not readily available, the area is predominantly agricultural, with a significant portion of its land dedicated to farming activities. As such, it is assumed that the Project Area will utilize less than 1% of the dedicated farmland within Vevay Township.

Onondaga Township encompasses approximately 23,354 acres of land. While specific data on the exact amount of farmland within the township is not readily available, the area is predominantly agricultural, with a significant portion of its land dedicated to farming activities. As such, it is assumed that the Project Area will utilize less than 1% of the dedicated farmland within Onondaga Township.

The Project Area will utilize less than 1% of the 189,573 acres of dedicated farmland within Ingham County.

4. Current percentage of land within the township and county considered farmland, differentiated by type.

Leslie Township covers approximately 22,612 acres, with much of this land primarily used for agriculture. Although exact farmland acreage isn't readily available, a substantial portion of the township supports farming activities.

Vevay Township covers approximately 20,250 acres, with much of this land primarily used for agriculture. Although exact farmland acreage isn't readily available, a substantial portion of the township supports farming activities.

Onondaga Township covers approximately 23,354 acres, with much of this land primarily used for agriculture. Although exact farmland acreage isn't readily available, a substantial portion of the township supports farming activities.

According to the 2022 Census of Agriculture, 189,573 acres out of the 355,840 acres of land within Ingham County, approximately 53.2%, is designated as farmland. Approximately 86.3% of the farmland in Ingham County is utilized as cropland, 6.79% as woodland, 4.65% as Other, and 2.26% as pastureland. In Ingham County, the primary crops are soybeans for beans covering approximately 33.3% of farmland, corn for grain at 30.8%, wheat for grain at 7.84%, forage (hay/haylage) at 5.71%, and corn for silage/greenchop at 2.33%.

5. Total acreage of farmland within the township and the county, differentiated by type.

Exact farmland acreage isn't readily available for Leslie, Vevay, or Onondaga townships. However, a substantial portion of the 22,612, 20,250, and 23,354-acre townships (respectively) support farming activities.

According to the 2022 Census of Agriculture, Ingham County contains 189,573 acres of designated farmland. Approximately 163,578 acres of the farmland in Ingham County is utilized as crop land, 12,886 acres as woodland, 8,822 as Other, and 4,287 as pastureland. The top crops in Ingham County are soybeans for beans at 63,188 acres, corn for grain at 58,475 acres, wheat for grain at 14,876, forage (hay/haylage) at 10,826 acres, and corn for silage/greenchop at 4,418 acres.

Based on the most recent NLCD data, the Project will utilize approximately 395 acres of cultivated crops in Leslie Township, approximately 346 acres in Vevay Township, and approximately 51 acres in Onondaga Township. According to the NRCS Web Soil Survey, the Project Area includes approximately 334 acres of prime farmland if drained and 72 acres of all areas classified as prime farmland in Leslie Township; 327 acres of prime farmland if drained, 49 acres of all areas classified as prime farmland, and 23 acres of farmland of local importance in Vevay Township; and 65 acres of prime farmland if drained and 11 acres of all areas classified as prime farmland in Onondaga Township.

For more information on Farmland Protection, see also **Appendix 3, Exhibit B-1**, Direct Testimony of E. Schenk, at pp. 22-23.

XI. EXHIBIT A-10: PUBLIC HEALTH AND SAFETY

Public health and safety impacts of the project are considered acceptable if the design criteria for the proposed facility are met. The following sections outline the applicable standards required for each type of proposed facility.

A-10.(a) – Solar Facility.

1. Setbacks

i. Occupied community buildings and dwellings on non-participating properties – 300 feet from nearest point on outer wall.

The proposed Project includes a setback for the solar facility perimeter fencing, positioned at a minimum of 300 feet from the nearest point on the outer wall of occupied community buildings and dwellings on non-participating properties. Refer to Proposed Setbacks and Proposed Conditions within the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-18.

ii. Public road right of way – 50 feet measured from the nearest edge of a public road right-of-way.

The proposed Project includes a setback for the solar facility perimeter fencing, positioned at a minimum of 50 feet from the nearest edge of any public road rights-of-way. Refer to Proposed

Setbacks and Proposed Conditions within the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-18.

iii. Non-participating parties – 50 feet measures from the nearest shared property line.

The proposed Project includes a setback for the solar facility perimeter fencing, positioned at a minimum of 50 feet from the nearest shared property lines of non-participating parties. Refer to Proposed Setbacks and Proposed Conditions within the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-18.

2. Fencing – National Electric Code, most recent version.

The Project is designed with perimeter security fencing that meets the requirements of the NEC. The Project has been designed to be completely enclosed by fencing that will restrict unauthorized access as required by federal regulation. A chain-link security fence, with a barbed-wire apron on extension arms, is to be used around the proposed substation only. The NEC requires seven-foot-tall fencing around the PV areas. Outside of the substation, fencing for the Project is planned to be seven feet tall, consisting of timber posts with zinc-coated woven wire fabric and 6-inch spacing, as shown in the Security Details included with Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-18.

To ensure the installation meets the requirements of NEC, and to protect people from dangerous step and touch potentials that can occur during a ground fault or lightning strike, the Project will conduct a grounding study during the EPC's preparation of the final site plan. The grounding study will include a site assessment, soil testing, system modeling, and electrical testing. Based on the analysis of results, the Project will be designed with selective materials and sizes to safely conduct fault currents and dissipate energy from fencing around the substation or other energized equipment. Included within **Appendix 2, Exhibit A-1.3** is a representative substation drawing showing how energized equipment will be grounded/bonded in compliance with NEC. This exact design is not being proposed for the Acceleration project, rather it is an example of what has been designed on former Ranger Power projects. During construction preparation, a final substation design will be prepared for Acceleration that follows NEC 2023 Article 250.190.

3. Maximum height – Solar array may not exceed 25 feet above ground at full tilt.

The maximum height of the solar arrays, and other collection devices, components, or buildings of the Commercial Solar Energy System, excluding substation and electrical transmission equipment, have been designed not to exceed 25 feet in height when oriented at maximum tilt (as measured from the natural grade at the base of improvements) at any time or location on the property. Refer to Solar Details within the Site Plan in **Appendix 2, Exhibit A-1.1**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 17-18.

4. Sound – Must not generate >55 decibel (dB); (average hourly) at nearest wall of nonparticipating property.

A sound report, in full compliance with all listed regulations, has been prepared and is available in **Appendix 2, Exhibit A-1.7**. This report includes sound modeling results conducted according to ISO 9613-2 (2024) standards to predict outdoor sound pressure levels and ensures that the facility does not exceed 55 decibels (average hourly) at the nearest wall of nonparticipating properties, in accordance with MCL 460.1226(8)(a)(iv) noise limits. See also **Appendix 3, Exhibit B-5**, Direct Testimony of J. Bowers, at pp. 3-5.

A-10.(b) – Wind Facility.

The proposed Project is not a wind facility and thus the standards for approval in Exhibit A-10.b do not apply.

A-10.(c) – Energy Storage Facility. Describe how the facility will meet the following standards:

The proposed Project is not an energy storage facility and thus the standards in Exhibit A-10.c do not apply.

XII. EXHIBIT A–11: DARK SKIES (SOLAR AND/OR STORAGE FACILITIES ONLY)

Provide plans to comply with dark sky-friendly lighting solutions for solar or storage facilities and light-mitigation plans for wind facilities as submitted to the Federal Aviation Administration, including exemptions requested for during the construction period.

The proposed Project is designed to align with DarkSky International’s five dark sky-friendly principles. Lighting will be limited to what is required for operation of the substation. This lighting will be shielded and directed downward to prevent excess illumination, adhering to dark sky guidelines. In addition, lighting will be warm colored, no brighter than necessary, and only used when necessary. No other exterior lighting is proposed for the facility, and no exemptions for additional lighting during construction. Refer to the Dark Skies Lighting Plan in **Appendix 2, Exhibit A-11**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 23.

XIII. EXHIBIT A–12: TRANSMISSION AND INTERCONNECTION AGREEMENTS

A-12.(a) – Provide the following information related to power transmission and interconnection.

- 1. Queue number or other information providing the ability to identify the proposed facility within the interconnection queue.**
- 2. Copies of all studies completed by the regional transmission organization including feasibility studies and system impact studies.**
 - i. If a generator interconnection agreement has been executed, the executed generator interconnection agreement may be submitted in lieu of the studies.**
 - ii. The generator interconnection agreement and/or studies may be filed subject to a protective order and non-disclosure agreement.**

The required information related to power transmission and interconnection, including the facility's queue number for identification within the interconnection queue, is included in the executed generator interconnection agreement provided in **Appendix 2, Exhibit A-12**. This executed agreement is being provided in lieu of the otherwise referenced studies. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris, at p. 19.

XIV. EXHIBIT A–13.1 THROUGH A-13.3: DECOMMISSIONING

EXHIBIT A-13.1 – DECOMMISSIONING PLAN

Submit a decommissioning plan that includes the following:

- 1. An overview of the proposed energy facility including:**
 - i. A detailed description of the proposed energy facility above ground and overview of the current land use of the site where the proposed energy facility will be located.**
 - ii. The expected useful life of the proposed energy facility.**
 - iii. A description of events which would trigger applicant-initiated decommissioning.**

d. An assurance that decommissioning plan updates and cost estimates shall be filed in the MPSC docket assigned to the energy facility.

e. An assurance that the financial assurance shall be updated according to the required periodic decommission plan and cost estimate updates.

f. Assurance that the applicant will provide annual proof in the MPSC docket assigned to the energy facility that the financial assurance remains sufficient and in effect.

g. A statement agreeing to provide a decommissioning completion report within 60 days after decommissioning is complete.

The Decommissioning Plan and Estimate for the proposed Project, included in **Appendix 2, Exhibit A-13.1**, covers all essential aspects for safe removal of the solar facility and land restoration. It includes a facility overview, expected useful life, triggers for decommissioning, soil analysis to ensure post-decommissioning soil quality, and an anticipated schedule to complete all decommissioning activities. The plan outlines the process for dismantling and removing facility components, hazardous materials management, and recycling or disposal methods.

The site restoration section details steps to return the land to a state similar to its pre-construction condition, following PA 116 requirements. Anticipated permits for demolition and temporary construction will be obtained prior to decommissioning.

Acceleration Solar will offer financial insurance in the form of parent company guarantee for MPSC's benefit. If requested, assurance in the form of surety bond or irrevocable letter of credit is also offered by the applicant.

The plan also includes commitments for periodic updates, landowner coordination, and assurances of compliance with MPSC requirements, as well as a final report within 60 days of decommissioning completion. For parcels involved in PA 116, required financial assurance will also satisfy the requirement of PA 233 and will not be double counted.

For more information, see also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 23-24.

EXHIBIT A-13.2 – DETAILED DECOMMISSIONING COST ESTIMATE

1. Provide a decommissioning cost estimate for restoration of participating properties to useful condition similar to that which existed before construction, including removal of above-surface facilities and infrastructure that have no ongoing purpose. The estimate must include the following:

i. Detailed cost estimates for removal of energy facility equipment and infrastructure, land restoration and reclamation, and liability insurance requirements calculated by a third party with expertise in decommissioning to restore to useful condition similar to before the energy facility.

ii. An estimate of salvage value for energy facility equipment and infrastructure calculated by a third party with expertise in decommissioning.

iii. An estimate of the cost to hire a decommissioning consultant to manage the decommissioning process in the event of owner abandonment or bankruptcy.

A detailed decommissioning cost estimate for restoring participating properties to a condition similar to that before construction is provided in **Appendix 2, Exhibit A-13.1**. This estimate includes third-party-calculated costs for equipment removal, land restoration, and liability insurance to ensure the site is returned to a usable state. Additionally, a third-party estimate of

the salvage value of facility equipment and infrastructure is included, along with a projected cost to hire a decommissioning consultant if needed due to owner abandonment or bankruptcy. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at pp. 23-24.

EXHIBIT A-13.3 – PROPOSED DECOMMISSIONING AGREEMENT

1. Submit a Decommissioning Agreement between the applicant and each Business Structure and State of Organization. A copy of the proposed agreement is provided in Attachment F and a word file is available here. Any changes to the sample agreement shall be redlined.

No Decommissioning Agreements have been secured at the time of filing this Application. The Proposed Decommissioning Agreement between the applicant and MPSC is included in **Appendix 2, Exhibit A-13.3**. See also **Appendix 3, Exhibit B-1**, Direct Testimony of S. Harris at p. 20.

Acceleration Solar intends to work with applicable landowners to enter into an Amended Farmland Development Rights Agreement with MDARD for the portion of the land included in the Project that is subject to MDARD’s PA-116 Program. Acceleration understands that, as part of the PA-116 deferment obligations, the Project will meet the following conditions:

A bond or irrevocable letter of credit as a surety tool is obtained and maintained in an amount sufficient to decommission the solar array and return the property to agricultural purposes. The financial surety must be in place for the entire deferment period. The amount of the financial surety shall be calculated by a licensed engineer and approved by MDARD. The surety must be payable to the State of Michigan as the sole beneficiary.

XV. EXHIBIT A–14: CONDITIONS

A-14.(a) – Submit a completed Exhibit N regarding the proposed minimum conditions in Attachment G.

1. The applicant shall include proposals to meet the proposed minimum conditions when filing an application or provide an explanation justifying why any of the proposed minimum conditions should not be applied to the facilities. Those participating in the case are encouraged to evaluate the efficacy of the proposed conditions made by the applicant in the application and to propose modifications or additions to proposed conditions in contested cases filed pursuant to PA 233.

2. For each condition listed, consider how the project meets, plans to meet, or should not be required to meet, that condition. Either reference where in the application that condition is addressed or provide a response – either in the table or as an attachment to the table (i.e., Exhibit O-1).

The Project will meet or exceed all standards for approval. Refer to Conditions in **Appendix 2, Exhibit A-14**. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 24-25.

XVI. EXHIBIT A–15: OTHER REQUESTED INFORMATION

A-15.(a) – Provide other information identified during a pre-application meeting or requested by the Commission that is not otherwise included in the preceding exhibits.

The Project conducted a pre-application meeting with MPSC on April 16, 2025. At this meeting Acceleration provided an overview of the Project, updates on engagement with ALUs and consultation with applicable agencies, and timing of public meetings. In addition, the Project Site Plan was shared, and Acceleration was able to ask questions to MPSC pertaining to PA233 application filing instructions and procedures. MPSC recommended clearly outlining potential changes within the Project layout in the application to the best of the applicant’s ability to prevent major changes that would require re-application. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 25.

XVII. EXHIBIT A-16: APPLICATION CHECKLIST

The checklist is available on the MPSC Renewable Energy and Energy Storage Facility Website. Staff may make non-substantive changes to this document over time to best accommodate the requirements as prescribed in the Application Filing Instructions and Procedures.

The application checklist, included in **Appendix 2, Exhibit A-16**, follows the most recently updated version available on the MPSC Renewable Energy and Energy Storage Facility Website to best accommodate the requirements as prescribed in the Application Filing Instructions and Procedures. See also **Appendix 3, Exhibit B-2**, Direct Testimony of E. Schenk, at p. 25.

XVIII. CONCLUSION

This submission and its attachments provide comprehensive documentation of Acceleration Solar’s compliance with the Michigan Public Service Commission’s (MPSC) solar energy siting certificate requirements, as outlined in the Application Filing Instructions and Procedures. The proposed Project is designed to strengthen Michigan’s electric grid by delivering reliable, cost-effective energy to meet fluctuating demand and support renewable integration. By enhancing grid resiliency, the Project contributes to a more stable and sustainable energy infrastructure. Acceleration Solar is committed to ensuring that all Project operations adhere to local, state, and federal regulations, maintaining high standards for environmental stewardship and community impact.