# ROUGET ROAD SOLAR FARM, LLC

## APPENDIX I

# DIRECT TESTIMONY

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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| In the matter of the application of ROUGET ROAD SOLAR FARM, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility. | ) ) ) ) ) ) | Case No. U-22003 |

**DIRECT TESTIMONY**

**OF**

**KEVIN COLE**

**ON BEHALF OF**

**ROUGET ROAD SOLAR FARM, LLC**

# APPENDIX I – EXHIBIT 1

December 12, 2025

## I. INTRODUCTION

**Q. Please state your name and business address.**

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

**Q. On whose behalf are you providing this testimony?**

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

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

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

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

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

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

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

**Q. What is RWE?**

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

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

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

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

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

Day-to-day, I manage all core development disciplines. That includes securing and maintaining site control, negotiating and refining land agreements, working directly with landowners, and guiding engineering teams as we advance project design from preliminary layouts toward Issued for Construction ("IFC") ready plans. I coordinate closely with

environmental, permitting, civil, electrical, interconnection, procurement, and construction teams, both internal subject matter experts and external consultants, to keep the project on schedule and aligned with state, county, and local requirements.

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

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

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

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

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

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

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

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

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

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

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

(1) **Carol Mcknight**, a Principal Project Manager at SWCA Environmental Consultants, Inc. ("SWCA"), addresses the environmental due diligence and surveys for the Project, the Project's environmental impacts, certain regulatory

outreach, and plans to minimize Project impacts along with related Project details, including cultural impacts, decommissioning, sound, and other items.

(2) **Monica Wilson**, a Project Manager at RWE, addresses and describes the construction timeline, permitting items, local job creation, and decommissioning costs.

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

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

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

## II. PURPOSE OF TESTIMONY

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

A. My testimony summarizes the project development services detailed in multiple portions of the narrative submitted with Rouget's Application (the "Application") as well as the exhibits attached thereto. Among other things, I assisted in the preparation of the Application and in the review and acceptance of the exhibits referenced in my testimony.

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

A. I am sponsoring, and/or have testimonial purview, as to the following exhibits in **Appendix II**: **Exhibit A-1.5; Exhibit A-2; Exhibit A-4.1; Exhibit A-4.2; Exhibit A-4.3; Exhibit A-8.1; Exhibit A-8.2; Exhibit A-8.3; Exhibit A-8.5; Exhibit A-12; Exhibit A-14;** and **Exhibit A-15.** Other witnesses may also be co-sponsoring or have overlapping testimonial purview as to some or all of the content of the foregoing exhibits as set forth in their respective testimonial submissions.

## III. PROJECT OVERVIEW AND SITE PLAN

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

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

Construction of the Project is expected to begin in 2027, with commercial operation anticipated by December 2028, dependent on receipt of permits, equipment, and approvals.

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

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

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

Aerial imagery and land use data indicate that the surrounding landscape is characterized by extensive farmland interspersed with woodlots, residential properties, and small commercial structures. The National Land Cover Database identifies the Project Area

as being composed of approximately 90% cultivated crops, 6% deciduous forest, 2% low-intensity development, 1% woody wetlands, and less than 1% of other land cover types including developed open space, medium- and high-intensity development, hay/pasture, and emergent herbaceous wetlands.

According to the 2020 U.S. Census, Palmyra Township is home to a small, close-knit population. The local economy is largely driven by agriculture, with additional employment in manufacturing, education, health care, and retail services. The nearby communities of Blissfield and Adrian provide additional infrastructure, services, and workforce support for the region. Lenawee County reflects a blend of rural character and small-town amenities, making it a suitable location for renewable energy development. Palmyra Township population: 955 (2020). Land-cover percentages derived from NLCD 2021. These values provide current context for the Project within township and county land use. Refer to **Appendix II, Exhibit A-2** for the Project Description

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

A. As of October 2025, there are currently no energy facilities sited within Palmyra Township so the percentage of land within the township dedicated to energy generation is 0%. At present, there is no publicly-available data detailing the exact percentage of land in Lenawee County, Michigan, that is dedicated to energy generation, excluding the Rouget Road Solar Farm Project. However, based on known projects and land use estimates, the total area occupied by other energy facilities in the county is relatively small. According to the MPSC GIS hub, there are currently two other utility-scale solar facilities, and one biomass power plant within Lenawee County. There are no wind, natural gas, petroleum,

coal, hydroelectric, nuclear, or crude oil facilities within Lenawee County as of October 2025. Lenawee County encompasses approximately 487,040 acres, and aside from the Project leased area, which alone covers about 2,133 acres, other energy projects are estimated to occupy fewer than 1,000 acres combined. This suggests that less than 0.25% of the county's land is currently dedicated to energy generation, not including the Project. Refer to **Appendix II, Exhibit A-2** for the Project Description

## IV. ALTERNATIVES AND CHANGES

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

A. RWE is the third-largest renewable energy company in the country. With seven projects under development in Michigan, a total of 21 operating facilities in the Midwest, and 12 projects currently under construction. With their combined experience and expertise, Rouget and RWE are well-positioned to evaluate potential project sites. I coordinated the preparation of the summary of alternatives included in the Application in **Appendix II**, **Exhibit A-1.5**.

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

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

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

## V. PROJECT DEVELOPMENT AND COMMUNITY OUTREACH

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

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

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

(2) **Local Units of Government**: Rouget has met with representatives from Palmyra Township to advise them of the Project, understand potential concerns, keep them apprised of the development schedule, and discuss community benefit agreements.

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

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

A. Yes. Rouget made a formal offer to meet with the chief elected official in the affected local unit ("ALU") to discuss the proposed Project and its implications for the community. The ALU contacted was Palmyra Township Supervisor, David Pixley. The meeting invitation sent on February 14, 2025, was 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. **Exhibit A-4.1**, **Appendix II**, includes a copy of the offer to meet with the legislative body of the affected ALU.

**Q. Did Rouget conduct meetings with the affected ALU?**

Yes. Following the meeting invitation described above, Rouget on March 4, 2025, conducted a voluntary meeting with Palmyra Township Supervisor, David Pixley, and Township Clerk, Christine Whited, to discuss the site plan, present community benefit agreements for review, and answer any questions. The details of the meeting with the affected ALU are as follows:

**Date:** April 14, 2025

**Time:** 4:00 – 5:00 pm

**Location:** Palmyra Township Hall, 6490 Palmyra Road, Palmyra Township

**Township Attendees:** Dave Pixley, Township Supervisor and Christine Whited, Township Clerk

**Rouget Road Solar, LLC Attendees:** Alannah Woodring, J. Kevin Cole, and Matt Drenning

**Topics Discussed:**

- Overview of Project site plan.
- Proposed community benefits.
- Presented a template community benefits agreement for review.
- Insight/Concerns from Dave Pixley:
  - Township well located near the Project at 4000 E Carlton Rd, Adrian MI.
  - Proposed substation location on Meyers Highway should be fine to do a parcel split because of the amount of frontage.
  - A future waterline project will intersect with the proposed Project workspace – Dave Pixley was concerned about setbacks to this waterline project because of the proposed Rouget Road Solar Project.

Rouget remains committed to engaging with local officials and fostering a collaborative dialogue throughout the Project development process.

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

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

**Q. Describe the public meetings.**

A. Rouget attended and participated in several town meetings, including special meetings, planning commission meetings, and board meetings (among others). Refer to **Exhibit A-**

**4.2** in **Appendix II** for a summary of the meetings, including the dates, attendees, and other applicable information such as meeting minutes and transcripts where available.

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

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

Palmyra Township

Timeline of Outreach: August 2024 - Current

Initial Contact: David Pixley, Township Supervisor

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

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

A. Yes. Based on comments during the April 14, 2025 public meeting provided by nonparticipating landowners within the Project's vicinity, the Project incorporated into the design additional landscape screening for nonparticipating landowners within one-quarter mile of the Project. **Appendix II, Exhibit A-1.1** (Sheets 20 through 24). A copy of the public meeting transcript as well as the public meeting comment cards are attached. **Exhibit A-4.3**, in **Appendix II**, also includes a summary of the accommodations made by Rouget following public comments received.

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

A. Yes. Rouget met with Commission Staff on August 4, 2025 for the required pre-Application meeting. Additionally, Rouget has met with Commission Staff on several additional occasions since the required pre-Application meeting to discuss the Project and the application submission materials.

## VI. AGREEMENTS WITH LANDOWNERS AND ANTICIPATED COMMUNITY BENEFITS

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

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

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

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

The most significant long-term payments to participating landowners are the Production Term Payments associated with Easement Agreements. The Rouget Project has solar panels sited within a fenced-in area of approximately 1,054 acres. The annual Production Term Payments to landowners is assessed based on the portion of the Property where solar panels have been sited.

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

A. On July 31, 2025, Rouget sent to the Chief Elected Official of Palmyra Township a Host Community Agreement ("HCA"). Palmyra Township responded on September 11, 2025, requesting changes to the HCA, which Rouget agreed to on September 25, 2025. A copy

of the November 12, 2025 signed HCA is included with the application in **Appendix II, Exhibit A-8.3**.

Consistent with PA 233, the Host Community Agreement includes an express provision in the Recitals, which is further affirmed in Section II, that Rouget will pay the contracting Township $2,000 per megawatt of nameplate capacity located within the Township to be used as determined by the Township for police, fire, public safety, or other infrastructure, or for other projects as determined by the Township.

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

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

**Tax Revenue Benefits**: 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, Rouget contracted with Magnum Economics ("Magnum") to conduct an economic and fiscal impacts analysis for the proposed Project. Magnum concluded that if the Project qualifies for and receives a Solar Energy Facility Exemption Certificate (SEFEC), cumulative revenues for local taxing districts would total an estimated $29.8 million over the Project's 35-year lifespan. This would represent an increase of roughly $27.8 million over the estimated $2.0 million that would be collected in the absence of the Project. The estimated revenues would be paid to Lenawee County ($8.8 million), Palmyra Township ($4.1 million), Blissfield Community School District ($4.3 million), Adrian City School

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

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

**Energy, Capacity, Reliability, and Resource Adequacy Needs**: 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. The design and purpose of this Project aligns with Michigan's energy targets and works towards a more resilient power grid. See **Exhibit A-8.5, Appendix II.**

## VII. TRANSMISSION AND INTERCONNECTION AGREEMENTS

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

A. Yes. 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 II**,

**Exhibit A-12**. This executed agreement is being provided in lieu of the otherwise referenced studies.

## VIII. MINIMUM CONDITIONS AND APPLICATION COMPLETION

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

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

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

A. No. Refer to **Appendix II**, **Exhibit A-15.**

## IX. CONCLUSION

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

A. I recommend approval of the Application as submitted.

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

A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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| In the matter of the application of ROUGET ROAD SOLAR FARM, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility. | ) ) ) ) ) ) | Case No. U-22003 |

**DIRECT TESTIMONY**

**OF**

**CAROL MCKNIGHT**

**ON BEHALF OF**

**ROUGET ROAD SOLAR FARM, LLC**

# APPENDIX I – EXHIBIT 2

December 12, 2025

# I. INTRODUCTION

**Q. Please state your name and business address.**

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

**Q. On whose behalf are you providing this testimony?**

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

**Q. Please summarize your educational background.**

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

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

A. I have worked as an environmental consultant since 1996 on a wide variety of projects and in a wide variety of capacities including but not limited to research, permitting, project management, and general planning. My work as a consultant has included assisting with large projects for both energy and non-energy clients, though most of my career has been related to power and energy projects. I have shifted within the last several years to focusing on large scale renewable energy projects like the Rouget Road Project now at issue. This has included consulting in support of multiple large-scale solar projects in the Midwest. I joined my current firm, SWCA Environmental Consultants ("SWCA") in March 2023,

where I have focused on working as a project manager coordinating and providing direction on permit requirements, and creating reports for renewable energy projects in particular. Prior to joining SWCA, I most recently worked as a consultant with natural resources and energy consulting firms including GHD and AECOM.

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

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

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

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

**Q. What is SWCA?**

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

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

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

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

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

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

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

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

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

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

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

## II. PURPOSE OF TESTIMONY

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

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

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

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

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

## III. PROJECT AREA AND USES

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SWCA further assisted in drafting the narrative and accompanying appendices describing intended measures to avoid impacts to local drainage (including Rouget Road's planned Minimize Mitigate and Repair ("MMR") Assessment related to drainage) and to neighboring parcels generally. In connection with preparing its MMR Assessment and Stormwater Mitigation Plan (see Exhibit A-6.1), Applicant has further conferred with the Lenawee County Drain Commission ("LCDC"), with future meetings intended as the

Project progresses; SWCA added details regarding its conference with the LCDCto the Agency Consultation Summary as well.

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

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

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

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

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

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

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

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

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

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

## IV. ENVIRONMENTAL COMPLIANCE AND MITIGATION

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

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

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

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

The purpose of the ECR is to summarize environmental diligence generally, but also describe the manner in which the Applicant intends to comply with all state and federal environmental laws, including, but not limited to, the federal Natural Resources and Environmental Protection Act ("NREPA"), as well as Public Act 451 of 1994, and Section 1705(2) of the Michigan Environmental Protection Act 9"MEPA"), MCL 324.1705(2).

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

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

A. Yes.

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

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

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

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

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

As to the third category, cultural impacts, the ECR describes SWCA's review of the National Register of Historic Places databases and other resources in seeking to identify whether there are known cultural resources within the Project Area. While desktop review did not reveal any specific such resources, SWCA's Cultural Resources Desktop Review (included as an appendix to The ECR) did identify that one previously recorded archaeological site, 20LE28, is potentially within the Project Site Plan boundary, though the archival information and extent of the site, which consists of an indigenous mound complex, is poorly understood. The ECR details SWCA's consultations with the State Historic Preservation Office (which are also detailed within Exhibit 4.4 (Agency Consultations)). At the SHPO's recommendation, SWCA and the Applicant are in the course of conducting a Phase I archaeological survey and undertaking further review to avoid any potential impacts. The Phase I archaeological survey will be done in accordance with SHPO standards for such efforts and with input from Federally recognized Tribal Nations. Should the assessment delineate resources within the Project Area, SWCA and Applicant anticipate implementing buffers and redesign as necessary to avoid adverse impacts, though the location and scale of such resources, if any, remains unknown at present. To that same end, the Unanticipated Discoveries Plan (Exhibit A-1.14), which SWCA developed in tandem with the Applicant, includes measures to address any human remains or unanticipated cultural resources identified through subsequent surveys or during construction or operation of the Project. As the 20LE28 site involves potential indigenous mound resources, the Applicant and SWCA have further solicited tribal engagement as described further within Exhibit A-4.5 (Tribal Consultation).

SWCA's review of the fourth category—Protected Lands—is also delineated within the ECR. According to the Protected areas Database of the United States (PAD-US), no protected areas are located within the Project Area. The ECR also accurately describes the Applicant's commitment to planting a mix of pollinator-friendly and regionally appropriate vegetation within the fenced-in areas of the Project—measures that will preserve the character of the surrounding environment and protect farmland and soil quality.

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

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

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

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

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

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

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

Consistent with my role as project manager, I reviewed and accepted the design plans and report summaries provided by SWCA technical staff in connection with

development of the Stormwater Mitigation Plan. The Plan has been accepted by Applicant, and it is true and complete to the best of my knowledge, information, and belief.

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

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

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

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

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

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

## V. AGENCY AND TRIBAL CONSULTATIONS

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

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

## VI. SAFETY RESPONSE AND PUBLIC HEALTH PLANS

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

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

The Emergency Response Plan ("ERP") identifies potential hazards and identifies training plans as well as emergency response measures for identified contingencies. Within the ERP are sets of communication protocols to ensure personnel and community safety, and that appropriate first responders are contacted in an effective and efficient manner. The ERP delineates roles and responsibilities for site personnel and identifies required types of contact information to ensure prompt communication.

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

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

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

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

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

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

## VII. CHANGES AND UNANTICIPATED DISCOVERIES

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

A. As discussed previously, RWE's planning for the Rouget Road Project first initiated prior to my joining the Project as a consultant in fall of 2024. Indeed, RWE's planning for this Project had been ongoing for several years before my involvement. Further, RWE, which is one of the largest owners of solar energy production in the world, has well-refined experience in planning projects to avoid undesirable impacts and to make efficient use of land and resources. Because the Project has undergone multiple levels of review and design during its multi-year development, and given RWE's experience, there are very few potential Changes that presently remain under consideration.

Together with the Applicant, I prepared the narrative and accompanying materials comprising Exhibit A-1.6 (Changes), which details only one potential change currently

under consideration (other than potential changes to roads and collection lines within the current Project Area). This change relates to extending boring under the Keeber County Drain, which may further reduce the already relatively minimal (7.96 acre) tree clearing planned for construction. Acreage for tree-clearing will be determined during final design in consultation with the MDNR, USFWS, and the Lenawee County Drain Commission.

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

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

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

The UDP was developed in consultation with SWCA's internal natural resources team and following in-depth environmental and natural resources review. This review included desktop assessments, field investigations, and site layout and impact assessments to identify how to minimize and mitigate impacts to state and federally regulated wetlands, streams, floodplains, parks, local species, and historic and cultural resources.

## VIII. COMPLAINT RESOLUTION

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

A. In consultant with Rouget Road and with its approval, SWCA prepared the Complaint Resolution Process included as an Appendix with Exhibit A-16 (Complaint Resolution). The Plan sets forth pertinent details for individuals to file complaints, including contact information and website information for the Project. It additionally describes Rouget Road's planned complaint review process, which will include determining if complaints relate to violations of laws or permit conditions, and if notifications are required to the MPSC or other entities resulting from the complaint. The process sets forth timelines (5 business days for acknowledgment, with intended resolution within 60 days where possible) and commits Rouget Road to filing logs of complaints and resolution with the MPSC on a quarterly basis. The Plan includes Rouget Road's promulgated complaint form as well.

## IX. SIGNAL MITIGATION

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

A. My team and I prepared a Signal Mitigation Plan included with the Application at Exhibit A-7. As described in the accompanying narrative and within the Plan itself, the Project is not reasonably expected to produce electromagnetic interference or to disrupt communication systems. The planned inverters for the Project are designed and certified to operate without causing harmful interference. The Plan further describes multiple mitigation measures, such as housing inverters and electrical components in grounded, shielded enclosures, that will be employed to further limit potential for radiated or conducted electromagnetic interference. The facility as a whole has been designed in accordance with or to exceed established industry and federal agency guidelines to avoid

interference and is expected to operate in harmony with existing communication and navigation systems. The narrative and accompanying Signal Mitigation Plan are true and complete to the best of my knowledge and belief.

## X. CHECKLIST

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

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

## XI. CONCLUSION

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

A. I recommend approval of the Application as submitted.

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

A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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| In the matter of the application of ROUGET ROAD SOLAR FARM, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility. | ) ) ) ) ) ) | Case No. U-22003 |

**DIRECT TESTIMONY**

**OF**

**MONICA WILSON**

**ON BEHALF OF**

**ROUGET ROAD SOLAR FARM, LLC**

# APPENDIX I – EXHIBIT 3

December 12, 2025

## I. INTRODUCTION

**Q. Please state your name and business address.**

A. My name is Monica Wilson. My business address is 353 North Clark Street, Chicago, IL 60654

**Q. On whose behalf are you providing this testimony?**

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

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

A. Since May 2025, I have been employed as a project manager by RWE Clean Energy ("RWE"). In that role, I manage pre-construction activities for solar, wind, and battery energy storage projects throughout the central and east regions for RWE. At RWE, I serve as a subject matter expert on issues including permitting, construction compliance, project schedules, and construction planning and management. I have had specific responsibility for overseeing development, pre-financing, and construction compliance for a portfolio of solar, battery energy storage systems, and wind energy projects that total output in excess of over 1,000 MW per year.

**Q. Please summarize your educational background.**

A. I have a Bachelor of Science degree in Environmental and Ecological Engineering from Purdue University, which I obtained in 2015.

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

A. I have worked for over 10 years in the construction industry. Since July 2021, I have specialized in handling construction and pre-construction projects related to utility scale renewable energy projects. Prior to joining RWE, I was employed by Invenergy, most recently as a project manager with responsibility for solar projects in Indiana ranging in size from 200 MW to 250 MW. Throughout my tenure at Invenergy, I had responsibility over permitting, design, construction, and project scheduling issues that arise in utility scale renewable energy projects, including solar projects. Before my time at Invenergy, I also held various positions at Walsh Construction where I oversaw site coordination, scheduling, financial, and pre-construction activities across the United States and Canada in commercial, federal, healthcare, and hospitality markets. In addition to general construction projects, over the course of my career, I have been responsible for overseeing development, pre-financing, and construction compliance for a portfolio of solar, battery energy storage systems, and wind energy projects with a total output of more than 3 GW.

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

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

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

A. At RWE, I primarily serve as a manager of utility-scale renewable energy projects, including solar projects. In that role, I guide projects from development to early-stage construction. With respect to the Project, I have worked directly with the Applicant regarding all construction and pre-construction project related matters. In this capacity, my

role has included managing the design of and contracting for the Project in preparation for construction. My responsibilities as pre-construction lead have also included procuring relevant permits, addressing local job creation and labor requirements, and development of the Project's decommissioning plan.

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

A. I am sponsoring and/or have testimonial purview, as to the following exhibits in **Appendix 2**: **Exhibit A-1.1** (site plan), **Exhibit A-1.4** (construction information), **Exhibit A-3** (the project schedule), **Exhibit 6.3** (permit list and status), and **Exhibit 8.4** (local job creation). Other witnesses may also co-sponsor or have overlapping testimonial purview as to some or all of the content of the foregoing exhibits as set forth in their testimonial submissions.

## II. CONSTRUCTION AND INSTALLATION METHODS

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

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

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

A. The Project will conduct soil surveying and testing, pursuant to the Natural Resources and Environmental Protection Act (NREPA). A soil survey protocol has been developed to compare pre-construction (existing) soil conditions to post-construction restoration conditions. This will ensure that the post-construction restoration soil conditions meets or exceeds that of pre-construction soil quality. **Appendix II Exhibit A-1.4** includes the soil survey protocol plan.

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

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

The Applicant has created a Standard Operating Procedure (SOP) for the discovery and management of contaminant-impacted soils during the construction phase of Applicant's Facilities. This SOP outlines the roles and responsibilities of Applicant's Personnel and the Construction Contractor (or EPC Contractor), if contaminant impacted soil is detected during construction. This document provides tools for the identification of contaminant impacted soil, the required materials needed for effective management of contaminant impacted soil, and the reporting procedures both internally and externally upon the discovery of contaminant impacted soils. A copy of the plan is provided in **Appendix II Exhibit A-4**.

The Project completed a Phase I Environmental Site Assessment ("ESA") in February 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). Standard E2247-23 incorporates Standard E1527-21 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process [ASTM 2021]) by reference and is intended to be no less stringent than Standard E1527-21. The goal of the processes established by this practice is to assess the property, to the extent feasible pursuant to the processes prescribed in ASTM Standard E2247-23, for the presence of recognized environmental conditions ("RECs"). The Project's 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, assessment has revealed no RECs, controlled RECs, or significant data gaps in connection with the subject property. Further information can be found in the Phase I Environmental Site Assessment in **Appendix 2, Exhibit A-1.4** Phase I ESA, which I have reviewed.

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

A. The Project is mostly located on relatively flat, open, agricultural land requiring little clearing and grading during construction, which minimizes the potential for erosion. Construction of the Project will include limited grading of the topsoil as part of the installation of Project infrastructure. At this stage of the Project, exact grading depths are

not known. It is anticipated that grading will involve cuts and fills within +/- 2 feet of existing grade. However, localized high and low areas may require greater depths/heights of cut and/or fill. Per equipment specifications slopes cannot be greater than 10% East/West/South and 5% North. Project slopes are expected to be less than the maximum design limit. The site design will be constructed using an approach that minimizes the amount of on-site grading required by the racking manufacturer's design specifications and the stormwater pollution prevention plan. Topsoil will be segregated on-site and de-compacted prior to spreading over the areas to be restored. The disturbed areas will be seeded to stabilize the Site after construction is completed. The Applicant will use, to the extent practicable, a perennial pollinator seed mix, that meets the Michigan Pollinator Habitat Scorecard, that will promote soil health, decompaction, and restoration during operation of the Project as well as provide habitat to pollinators and other wildlife.

Minimal excavation for installment of infrastructure is anticipated for this Project. A grading analysis will be performed as part of the site engineering design, and soil will be cut and filled as necessary to maintain drainage and slope per equipment and site access road needs. In areas where grading is needed, the topsoil will be stripped and stockpiled in an upload area to be respread on the same land for permanent vegetation establishment. Cable runs will be trenched as needed to minimize overall land disturbance. Each solar module tracking system will be supported by steel posts driven into the ground. Each tracker system will be supported by 10 or 15 steel piles, dependent on string length. The entire system will be supported by approximately 120,000 steel piles installed with a pile-driving machine. Grading will also be required for construction of both temporary and permanent sediment basins. The grading and excavation activities required for the Project

will be conducted in accordance with county-level erosion control requirements and the EGLE-issued Notice of Coverage under the National Pollutant Discharge Elimination System permit. Refer to Sheet 30 in **Appendix II, Exhibit A-1.1** for details and typical grading and excavation schematics for additional information.

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

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

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

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

Approximately 46,000 linear feet of internal access roads will be constructed. The Project does not anticipate using existing access roads. The final location and length of these internal access roads will depend on the final site design issued for construction but will be within the Project Area. Access roads within and around the Project Area will be designed with conventional stone at least 6 to 10 inches thick and engineered to support

project construction as well as post-construction traffic which will be primarily light maintenance vehicles. The roads will meet the requirement to support a maximum vehicle load of 80,000 pounds for fire truck access. In addition, the substation access road will be able to support heavy vehicle delivery (HS-20 loading) up to two times per year throughout the design life.

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

During construction, the Project plans to incorporate approximately five construction laydown and staging areas for PV solar module construction and the substation. Laydown areas will be prepared prior to the construction of access roads. Each laydown area may include trailers, storage areas, a gravel parking lot, a water tank, generators/power service, communications, and trash and recycling. These laydown areas are within the Project Area and will total approximately 80 acres. Additionally, there may be other areas used for laydown, assembly, cable pulling/tensioning, storage, etc., that may be in and around the PV solar module areas within the Project Area. The exact location, size, and quantity of temporary laydown areas will be determined by the general contractor and will be located within the proposed limits of disturbance ("LOD"). Any internal access roads may remain after the completion of construction. The laydown areas will be restored to pre-construction contours and re-vegetated following construction if they are outside of the PV solar module areas. Temporary sediment and erosion control measures will be installed throughout the Project Area final plans.

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

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

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

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

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

A. The Project will include approximately 46 inverters and power stations that will be installed to convert the DC electrical power generated by the PV solar modules to AC electrical power to be delivered to the POI. MV transformers will step up the AC to 34.5 kilovolts (kV) and DC collection lines that collect the power from a specific set of trackers to a single combiner box will be installed underground and/or above ground for the Project.

The AC collection system will be comprised of underground MV cable that will transmit the power from each inverter/power station to the Project substation. The three-

phase 34.5-kV AC collection system with communication wire may be underground or overhead. The collection system will total approximately 135,350 linear feet (26 miles) of belowground or aboveground copper and aluminum wiring.

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

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

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

A. The Project will install all underground collection outside the substation fence at a minimum of 4 feet below existing grade. Precise depths for utility crossings under county roads and county drains will be determined through further consultation with the Ingham County Road Department and Ingham County Drain Commission. Illustrative details are shown for underground collection on Sheets 5-9 of the Site Plan in **Appendix 2**, **Exhibit**

**A-1.1** and additional notes are provided in Solar Details & Construction Information on Sheet 16, both of which I have reviewed.

## III. PROJECT SCHEDULE

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

A. Once approved by the Commission, the Project's construction activities are estimated to begin in March 2027. Construction is then expected to take approximately 1.5 years, with the anticipated completion date in the second quarter around September 2028. I have provided a more detailed breakdown of the Project's development stages from the establishment of the electrical queue position to the commercial operation date, which is included in the table below:

**Rouget Road Solar Farm Development and Construction Schedule**

| Milestone | Date | Status |
|---|---|---|
| Queue Position Established | 6/22/2023 | Complete |
| Site Control Completed | 11/1/2024 | Complete |
| Environmental Studies Complete | Q4 2025 | Expected |
| Technical Studies Complete | Q3 2025 | Complete |
| Interconnection Agreement Executed | Q4 2023 | Complete |
| Discretionary Permits Secured | Q4 2026 | Expected |
| Financing Secured | Q4 2026 | Expected |
| EPC Contract Executed | Q1 2027 | Expected |
| Construction Start | March 2027 | Expected |
| Pile Installation | May – Nov 2027 | Expected |
| Electrical Underground | May – Sep 2027 | Expected |
| Tracker Installation | June – Dec 2027 | Expected |
| Module Installation | July – Dec 2027 | Expected |
| Delivery & Installation of Main Power Transformer | Q3 – Q4 2027 | Expected |

| | | |
|---|---|---|
| Energization for Interconnection | Q1 2028 | Expected |
| Commissioning and Regulatory Testing | Q1 – Q3 2028 | Expected |
| Commercial Operation Date | Sep 2028 | Expected |

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

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

Development of the Application for the MPSC commenced in the first quarter of 2025 and has been ongoing since then. The Application will be submitted to the MPSC in the fourth quarter of 2025. The Applicant anticipates that the certificate will be issued in the fourth quarter of 2026. The Applicant anticipates that preparation of the final design, marked by completion of 90% design, will commence in the first quarter of 2026 and be completed during the third quarter of 2026.

A general contractor will be retained by the Applicant prior to the start of construction to manage the equipment and material procurement, as well as all construction permits required prior to groundbreaking. The general contractor will work with the

Applicant to finalize the site design and ensure that all applicable permits and approvals have been obtained for the Project before construction commences.

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

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

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

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

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

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

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

*Queue Position Established*

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

*Site Control Completed*

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

*Environmental Studies Complete*

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

*Technical Studies Complete*

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

*Interconnection Agreement Executed*

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

*Discretionary Permits Secured*

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

*Financing Secured*

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

*EPC Contract Executed*

The project will engage EPC contractor(s) to support the development and permitting process. Prior to financing, this work will be completed via Limited Notice(s) to Proceed ("LNTP") or Pre-Construction Services Agreement ("PCSA"). But after financing is secured, the executed EPC contract(s) will cover the entirety of the Project though the commercial operation date.

*Construction Start*

While some construction work may begin under LNTP or PCSA before financing is secured and the EPC contract is executed, the vast majority of the work will begin post-EPC contract execution. This element of the schedule is identified when construction crews

will mobilize to the site and begin grading and site preparation. Such work will include best management practices as to stormwater and other features required under permits.

*Pile Installation*

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

*Electrical Underground*

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

*Tracker Installation*

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

*Module Installation*

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

*Delivery & Installation of Main Power Transformer*

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

*Energization for Interconnection*

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

*Commissioning & Regulatory Testing*

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

*Commercial Operation Date*

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

## IV. PERMIT LIST AND STATUS

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

Applicant will supplement its filing to ensure the Commission is properly informed.

Current permit information is provided as follows:

| V.Subject | Responsible Agency | Anticipated Date of Application Submission | Anticipated Date of Permit/Approval Issuance |
|---|---|---|---|
| Part 301, Inland Lakes and Streams Permit; Part 303, Wetlands Protection Permit | Michigan Department of Environment, Great Lakes, and Energy | Q3 2026 | Q1 2027 |
| Part 31 Water Resources, of the NREPA – Permit by Rule (R 323.2190); Notice of Coverage (NOC) National Pollutant Discharge Elimination System (NPDES) permit | | Q3 2026 | Q1 2027 |
| Oversize/Overweight Vehicle Permit | Michigan Department of Transportation | Q4 2026 | Q1 2027 |
| Encroachment Permit | | Q4 2026 | Q1 2027 |
| PA116 | Michigan Department of Agriculture and Rural Development | Q4 2025 | Q1 2026 |
| Drive Access Permit | Lenawee County Road Commission | Q4 2026 | Q1 2027 |
| Driveway Permit | | Q4 2026 | Q1 2027 |
| Right-of-Way Permit | | Q4 2026 | Q1 2027 |
| Transportation Permit | | Q4 2026 | Q1 2027 |
| Road Use Agreement | | Q4 2026 | Q1 2027 |
| Drain Crossing Permit | Lenawee County Drain Commission | Q1 2027 | Q1 2027 |
| Part 91, SESC, of the Natural Resources and Environmental Protection Act (NREPA), of 1994 PA 451, as amended, Soil Erosion Permit | Lenawee County Drain Commission | Q1 2027 | Q1 2027 |
| Well and/or Sewage Disposal Construction Permit | Lenawee County Health Department | Q1 2027 | Q1 2027 |
| Building Permit | Palmyra Township | Q1 2027 | Q1 2027 |
| Electrical Permit | Palmyra Township | Q1 2027 | Q1 2027 |
| Mechanical Permit | Palmyra Township | Q1 2027 | Q1 2027 |
| Plumbing Permit | Palmyra Township | Q1 2027 | Q1 2027 |

| | | | |
|---|---|---|---|
| Utility Crossing Agreement | Citizens Light & Power Co. | Q3 2026 | Q1 2027 |
| Utility Crossing Agreement | Consumers Power Company, A Maine Corporation | Q3 2026 | Q1 2027 |
| Utility Crossing Agreement | Marathon Pipeline Company | Q3 2026 | Q1 2027 |
| Utility Crossing Agreement | Goetz River Farms, Inc., A Michigan Corporation | Q3 2026 | Q1 2027 |
| Utility Crossing Agreement | Midwest Energy Cell Tower | Q3 2026 | Q1 2027 |

## VI. LOCAL JOB CREATION AND PROJECT LABOR AGREEMENT

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

Both the construction and operation of the Project will benefit Lenawee County through creating jobs in the community. Applicant received estimates from Magnum Economics, which employed a regional economic implant modeling system known as "IMPLAN." Among other economic benefits, Magnum Economics projected that the Project would directly support 37 construction-related jobs in Lenawee County. Additionally, the model estimates an additional 64 indirect and induced jobs would be supported at local businesses through construction purchases and spending and when workers supported by the Project spend their wages in the local community. Further, during operation of the Project, an estimated 4 direct jobs would be created and an additional 10 indirect and induced jobs would be supported through local operational spending and the local spending of workers supported by the Project.

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

A. Yes. The Applicant will require its EPC contractor to enter into a project labor agreement (PLA), or similar agreement, with one or more labor organizations prior to the start of

construction. At this stage, Applicant has identified the International Brotherhood of Electrical Workers Local 9 as a potential signatory. Applicant contacted the IBEW Local 8 to introduce the Project and obtain a point of contact. Jake Meyers, Lenawee County representative, provided a copy of the union's National Tri-Trade Solar Agreement (refer to **Appendix II Exhibit A-8.4**). Applicant has prepared a letter of intent to utilize a PLA, which is provided in **Appendix II Exhibit A-8.4**. Applicant further commits to providing a copy of the executed PLA or similar agreement to the Commission once it is available.

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

A. I recommend approval of the Application as submitted.

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

A. Yes.

4932-8000-1915 v6 [110810-13]

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

| | | |
|---|---|---|
| In the matter of the application of ROUGET ROAD SOLAR FARM, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility. | ) ) ) ) ) ) | Case No. U-22003 |

**DIRECT TESTIMONY**

**OF**

**BLAKE HOLCOMB**

**ON BEHALF OF**

**ROUGET ROAD SOLAR FARM, LLC**

# APPENDIX I – EXHIBIT 4

December 12, 2025

# I. INTRODUCTION

**Q. Please state your name and business address.**

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

**Q. On whose behalf are you providing this testimony?**

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

**Q. Please summarize your educational background.**

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

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

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

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

A. I have been a professional engineer licensed through the State of Florida since 2011. Additionally, I hold a certification issued by the Florida Department of Environmental Protection in 2010 as a Qualified Stormwater Erosion and Sedimentation Control Inspector.

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

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

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

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

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

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

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

A. No.

## II. PURPOSE OF TESTIMONY

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

**Q.** My testimony summarizes the narratives and attached exhibits contained in Rouget's Application (the "Application"), which concern (i) the Project's Site Plan and (ii) the Project's Preliminary Stormwater Mitigation Plan.

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

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

## III. PROJECT OVERVIEW AND SITE PLAN

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

A. I oversaw SWCA's development of the Site Plan (**Appendix II Exhibit A-1.1**). The Site Plan relies on aerial photographs as the underlying "map" upon which SWCA applied visual overlays to identify existing and proposed conditions relative to the Project. As to existing conditions, the Site Plan identifies participating and nonparticipating parcel boundaries, occupied structures, public roads, railroads, public rights-of-way, existing public utilities, and approximate easement locations using publicly available geographic information system ("GIS") data, as well as survey data maintained by the American Land Title Association ("ALTA").

As to proposed conditions, the Site Plan identifies planned facilities, fences, access paths, buildings, planned screening, landscaping, and vegetative cover. The Site Plan also

identifies the utility interconnection location, as well as clearing locations and disturbance limits. As to proposed ancillary features required for construction and operation of the Project, the Site Plan identifies internal access paths, substations, switchyards, and laydown areas.

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

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

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

A. SWCA assisted Applicant in identifying reasonable plans to address areas of the Project that may not already have sufficient natural vegetative screening or other obscuring structures. The Site Plan included in **Appendix II Exhibit A-1.1** uses aerial photographs as the underlying maps upon which overlays were applied to identify planned facilities,

fences, roads, occupied buildings, and planned screening, landscaping, and vegetative cover. The Project proposes to use fencing and screening to minimize the visual impact of the Project. The Project's proposed screening plan takes into account various aspects of local ordinances as well as feedback received from local community members.

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

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

(1) 300-foot setbacks from the nearest point on the outer wall of any occupied community building or dwelling on non-participating properties;

(2) 50-foot setbacks from the nearest edge of public road rights-of-way;

(3) 50-foot setbacks from the shared property line of any adjacent non-participating parcel.

All solar equipment and infrastructure are sited in full compliance with the required setback standards. Site planning incorporated aerial imagery, parcel boundaries, and field verification to ensure adherence. Refer to proposed setbacks and proposed conditions in the Site Plan in **Appendix II Exhibit A-1.1**. The Site Plan includes a dimensioned map showing setbacks from the Project boundary and fences to all structures on participating properties, road rights-of-way, waterways, wetlands, occupied structures on non-participating properties, and property lines of non-participating properties. Such setbacks are depicted on Sheet 6 of the Site Plan in **Appendix II Exhibit A-1.1**.

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

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

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

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

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

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

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

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

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

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

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

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

## IV. PRELIMINARY STORMWATER MITIGATION PLAN

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

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

The Stormwater Mitigation Plan ("Plan") is intended to describe the Applicant's pre-construction review and planning relating to stormwater drainage, consultations with local drainage officials, and future (both pre- and post-construction) plans related to

assuring that there is no unreasonable effect on stormwater drainage as a result of the Project.

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

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

Based on Site design, peak flow analysis for 10-year, 25-year, and 100-year storm events has been modeled at multiple nodes, with results indicating that peak discharge rates for post-development conditions are lower than the pre-development peak discharge rates for the storm events evaluated. The Plan further concludes that the proposed Project will result in a net improvement in stormwater quality.

The Plan concludes by describing the Applicant's intent to prepare a Stormwater Pollution Prevention Plan ("SWPPP") in accordance with the requirements of the EGLE Construction Storm Water General Permit ("CGP"), the Natural Resources and Environmental Protection Act (NREPA), Part 91 – Soil Erosion and Sedimentation Control

(MCL 324.9101–324.9123), the requirements of the LCDC, and the MPSC. The Plan further lists the intended elements of the SWPPP and presents a summary of the required regulatory permits and notices to be completed both before and during construction (including a Permitting Matrix Summary). The Applicant has committed to not commencing construction until all necessary permits are obtained and all regulatory conditions are satisfied.

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

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

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

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

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

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

As to repair measures, the MMR confirms that the Applicant will apply temporary Soil Erosion and Sediment Control ("SESC") BMPs such as seed and mulch, silt fences, check dams, rock filters, sediment basins, and tracking mats to reduce construction-related erosion. Additionally, the MMR provides for reseeding and revegetation to replenish ground cover. Rouget will clean, clear, repair, or replace drains and culverts damaged by Project activity.

Finally, the MMR confirms that Rouget will engage an Engineering, Procurement, and Construction ("EPC") contractor charged with providing a responsive plan to address frac-out of drilling fluids. The MMR confirms that the frac-out responsive plan will be

created in accordance with the guidelines identified in Section 2.2 of **Appendix II Exhibit A-6.4**.

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

A. SWCA reviewed the Federal Emergency Management Agency ("FEMA") Floodplain Panel ID Numerical 26091C0225D and 26091C0350D (effective date 08/15/2019) and determined that the Project lies within Flood Zone X and Flood Zone A. Elevations within the Project Area range from approximately 780 feet NAVD88 to 692 feet NAVD88. Using the LIDAR topographical survey data, the overall watershed boundary was determined. The existing ground within the Project Area generally drains west to east, discharging into a network of Lenawee County Drainage Commission ditches that traverse through the proposed Site Plan boundary area. Existing National Land Cover Database ("NLCD") land cover types were identified within each basin and were either confirmed or adjusted based on desktop verification. Composite Facility runoff curve numbers ("CN") and time of concentration calculations were completed for each basin. Hydraulic and hydrologic modeling was completed to simulate pre-development stages, routing, runoff volumes, and peak flows for each drainage basin across the Project using Stormwise. The results of SWCA's pre-development drainage analysis are contained in Section 3.1 of **Appendix II Exhibit A-6.4**.

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

A. The EPC contractor will be responsible for developing the mass grading plan and final size, locations, and outfall structures for the stormwater management system during the final

design phase. The EPC contractor will ensure that post-development hydrologic and hydraulic modeling processes, including SCS TR-55 and CN methodologies, the Stormwise modeling approach, and boundary condition nodal connectivity are consistent with the pre-development modeling processes. SWCA's present analysis indicates that post-development basin boundaries are consistent with pre-development basin boundaries based on the design approach, and determined that a reduction in peak flow rates are expected due to improved land cover conditions for the Project. The results of SWCA's post-development drainage analysis are contained in Section 3.2 of **Appendix II Exhibit A-6.4**.

## V. CONCLUSION

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

A. I recommend approval of the Application as submitted.

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

Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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| | | |
|---|---|---|
| In the matter of the application of ROUGET ROAD SOLAR FARM, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility. | ) ) ) ) ) ) | Case No. U-22003 |

**DIRECT TESTIMONY**

**OF**

**MATT PIERCE**

**ON BEHALF OF**

**ROUGET ROAD SOLAR FARM, LLC**

# APPENDIX I – EXHIBIT 5

December 12, 2025

# I. INTRODUCTION

**Q. Please state your name and business address.**

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

**Q. On whose behalf are you providing this testimony?**

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

**Q. Please summarize your educational background.**

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

**Q. Do you hold any licenses or professional certifications?**

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

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

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

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

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

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

**Q. What is SWCA?**

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

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

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

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

## II.PURPOSE AND SCOPE OF TESTIMONY

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

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

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

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

## III.STORMWATER MITIGATION

**Q. Please describe the Applicant's Stormwater Mitigation Plan.**

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

The Stormwater Mitigation Plan ("Plan") is intended to describe the Applicant's pre-construction review and planning relating to stormwater drainage, consultations with

local drainage officials, and future (both pre- and post-construction) plans related to assuring that there is no unreasonable effect on stormwater drainage as a result of the Project.

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

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

The Plan concludes by describing the Applicant's intent to prepare a Stormwater Pollution Prevention Plan ("SWPPP") in accordance with the requirement of an EGLE Construction Storm Water General Permit and Part 91 of NREPA, as well as any requirements imposed by the LCDC and MPSC. It further lists the intended elements of the SWPPP and presents a summary of the required regulatory permits and notices to be

completed both before and during construction (including a Permitting Matrix Summary). Applicant has committed to not commencing construction until all necessary permits are obtained and all regulatory conditions are satisfied.

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

## IV.CONCLUSION

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

A. I recommend approval of the Application as submitted.

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

A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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| | | |
|---|---|---|
| In the matter of the application of ROUGET ROAD SOLAR FARM, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility. | ) ) ) ) ) ) | Case No. U-22003 |

**DIRECT TESTIMONY**

**OF**

**RYAN RUPPRECHT**

**ON BEHALF OF**

**ROUGET ROAD SOLAR FARM, LLC**

# APPENDIX I – EXHIBIT 6

December 12, 2025

# I. INTRODUCTION

**Q. Please state your name and business address.**

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

**Q. On whose behalf are you providing this testimony?**

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

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

A. Since January 2022, I have been employed as a Senior Project Manager by SWCA Environmental Consultants. In that role, I manage and oversee projects for utility-scale renewables, electrical transmission lines, refineries, power plants, petrochemical facilities, and gas/oil pipelines.

**Q. Please summarize your educational background.**

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

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

A. I have worked for over 20 years in the environmental consulting industry. Since November 2004, I have specialized in National Environmental Policy Act (NEPA) compliance, navigating state siting boards requirements, preparing Environmental Assessments (EAs)

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

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

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

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

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

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

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

## II. DECOMMISSIONING PLAN

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

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

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

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

The decommissioning plan explains how the Project will be dismantled including the removal of Project infrastructure and equipment, management of hazardous materials, and cost estimate for the decommissioning of the Project, which is provided in Section 4 of the Decommissioning Plan. See **Appendix II Exhibit A-13**. That estimate reflects the projected cost for restoring 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. Those costs include detailed estimates for removal of energy facility equipment and infrastructure, land restoration and reclamation,

liability insurance, and costs of managing the decommissioning process that Applicant expects will be associated with restoring the relevant properties to their prior useful condition. Before sponsoring Applicant's decommissioning plan as an exhibit, I reviewed the plan with SWCA for completeness and accuracy.

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

Section 4.1 of the decommissioning plan also includes an estimate of decommissioning costs. That estimate reflects the projected cost for restoring 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. Those costs include detailed estimates for removal of energy facility equipment and infrastructure, land restoration and reclamation, liability insurance, and costs of managing the decommissioning process that Applicant expects will be associated with restoring the relevant properties to their prior useful condition.

Section 4.2 of the Decommissioning Plan also contains an estimate of the salvage value for energy facility equipment and infrastructure associated with the Project. **Appendix II Exhibit A-13**. SWCA estimates that the revenue derived from salvage will total $2,363,764.15. Applicant plans to reassess all decommissioning figures periodically as the Commission may require.

I have also reviewed the proposed decommissioning agreement for the Project, which can be found as Exhibit B to the Project's decommissioning plan. As that proposed

decommissioning agreement shows, Applicant plans to follow the sample decommissioning agreement provided by the Commission without alteration.

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

A. I recommend approval of the Application as submitted.

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

A. Yes.