SILVER MAPLE PV, LLC

APPENDIX II

DIRECT TESTIMONY

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22071

DIRECT TESTIMONY

OF

JOSEPH BROCHU

ON BEHALF OF

SILVER MAPLE PV, LLC

APPENDIX II – EXHIBIT 1

April 3, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Joseph Brochu, 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 Silver Maple PV, LLC ("Silver Maple" or "the Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Silver Maple Solar Project (the "Project"). Silver Maple is a wholly owned subsidiary of RWE Americas, LLC f/k/a RWE Clean Energy, LLC ("RWE"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 200 MW of photovoltaic solar panels, to be located within Jamestown and Zeeland Townships in Ottawa County, Michigan.

Q. Please summarize your educational experience.

A. I hold a Bachelor of Science in Mechanical Engineering from the University of Illinois, a Masters equivalent (Navy Nuclear Power Training Command) in Nuclear Engineering, and a Master of Business Administration, Strategy from Northwestern University's Kellogg School of Management.

Q. Please summarize your professional experience.

A. I have been a Utility-Scale Development Manager at RWE for almost two years. During this time, I have worked on early, mid, and advanced-stage development of solar energy and battery storage projects in the State of Michigan.

Before joining RWE, I was an officer in the U.S. Navy. Specifically, I served as a Division Officer on the USS Charlotte stationed in Pearl Harbor, Hawaii, and as a submarine operations staff planner for Destroyer Squadron One stationed in San Diego,

California. While earning my MBA at Northwestern, I was an Assistant Professor of Naval Science for Northwestern University's Navy ROTC program. Immediately prior to joining RWE, I worked at Kairos Power where, among other things, I assisted the company with strategic planning and entry into new energy markets.

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 utility-scale 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 12 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 Silver Maple, 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 Utility-Scale 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 and battery energy storage systems, with a strong focus on delivering bankable, technically sound, and community-supported projects in Michigan.

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 ("SMEs") 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 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 roughly two years with RWE, I have served as the Utility-Scale Development Manager for four large-scale solar projects and two battery storage projects.

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

A. As Utility-Scale Development Manager for Silver Maple, I am 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 Silver Maple 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 Silver Maple 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) **Gautam Swamynathan**, 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 Silver Maple'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 I**: **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 200 MW, with the panels themselves sitting on a fenced in area of approximately 1,127 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 (as applicable), 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 I**, **Exhibit A-2.**

Construction of the Project is expected to begin in Q2 of 2027, with commercial operation anticipated by Q4 of 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 I**, **Exhibit A-1.1**, which exhibit Silver Maple 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 Ottawa County in Jamestown and Zeeland Townships, Michigan, approximately 4.3 miles east of Zeeland and 3.6 miles southwest of Hudsonville.

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 91% cultivated crops, 2% deciduous forest, 2% low-intensity development, 2% developed open space, 1% medium intensity development, 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, Jamestown and Zeeland Townships are home to a small, close-knit population. The local economy is largely driven by agriculture and manufacturing, with additional employment in education, health care, and retail services. The nearby communities of Hudsonville and Zeeland provide additional infrastructure, services, and workforce support for the region. Ottawa County reflects a blend of rural character and small-town amenities, making it a suitable location for renewable energy development. Jamestown Township population: 9,630 (2020). Zeeland Township population: 12,008 (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 I, 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 January 2026, there are currently no energy facilities sited within Jamestown and Zeeland Townships so the percentage of land within the townships dedicated to energy generation is 0%. At present, there is no publicly-available data detailing the exact percentage of land in Ottawa County, Michigan, that is dedicated to energy generation, excluding the Silver Maple 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 is currently one other utility-scale solar facility, one coal plant, five natural gas power plants, two landfill gas power plants, one power plant with other waste biomass and three refined petroleum product terminals within Ottawa County. There are no wind, hydroelectric, nuclear, or crude oil facilities within Ottawa County as of January 2026. Ottawa County encompasses approximately 1,044,480 acres, and aside from the Project leased area, which alone covers about 1,914 acres, other energy projects are estimated to occupy fewer than 1,000 acres combined. This suggests that less than 0.1% of the county's land is currently dedicated to energy generation, not including the Project. Refer to **Appendix I, 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, Silver Maple 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 I**, **Exhibit A-1.5**.

Key to the consideration of alternatives were three main factors: strong land fundamentals and compatible land use; existing transmission interconnection infrastructure; 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 I**, **Exhibit A-1.6** of the Application. Such potential changes include increasing applicable setbacks from public roads, rearranging inverter locations to address sound levels, and changing access road locations to address feasibility, landowner requests, and approval from the Ottawa County Road Commission.

V. PROJECT DEVELOPMENT AND COMMUNITY OUTREACH

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

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

(1) **Local Residents**: Silver Maple has been meeting with prospective landowners and nearby residents since 2020 to determine local interest in the Project, address local concerns and answer questions about the Project and Silver Maple, and to secure land rights. Silver Maple also met with, or attempted to meet with, all non-participating adjacent residences to the Project.

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

(3) **Public**: Silver Maple 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 I**, **Exhibit A-4.2**.

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

A. Yes. Silver Maple made a formal offer to meet with the chief elected official in each affected local unit ("ALU") to discuss the proposed Project and its implications for the community. On October 2, 2025, Silver Maple sent letters via email and certified mail to Laurie Van Haitsma, the Jamestown Township Supervisor, and Tom Oonk, the Zeeland Township Supervisor, offering to meet and discuss the Project and whether the Townships have a Compatible Renewable Energy Ordinance ("CREO"). **Exhibit A-4.1**, **Appendix I**, includes a copy of the offer to meet with the legislative body of the affected ALUs.

Q. Did Silver Maple conduct meetings with the affected ALUs?

Yes. Following the meeting invitation described above, Silver Maple on October 16, 2025, conducted a meeting with Jamestown Township officials, including Laurie Van Haitsma (Township Supervisor), Scott Brouwer (Township Treasurer), Dean Smith (Township Planning Commission Chairman), and Gregory Ransford (Township Planner). The details of the meeting with the affected ALU are as follows:

Date: October 16, 2025

Time: 12:00 – 1:00 pm EST

Location: Jamestown Township Hall, 2380 Riley Street, Hudsonville, MI 49426

Township Attendees: Laurie Van Haitsma (Township Supervisor), Scott Brouwer (Township Treasurer), Dean Smith (Township Planning Commission Chairman), and Gregory Ransford (Township Planner)

Silver Maple Attendees: Joseph Brochu (Development Manager), John Panther (Development Manager)

Topics Discussed:

- Overview of Project site plan and timeline
- Proposed community benefits
- PA233 application process
- Discussion of Jamestown's workable ordinance and details that prevent it from being a CREO
- Insight/concerns from Jamestown Township
- Emphasized importance of spreading awareness of project and giving adequate notice to residents prior to public meeting

Silver Maple also conducted a meeting on October 16, 2025, with officials from

Zeeland Township. The details of that meeting are as follows:

Date: October 16, 2025

Time: 10:00 – 11:00 AM EST

Location: Zeeland Township Hall, 6582 Byron Road, Zeeland, MI 49464

Township Attendees: Tom Oonk (Township Supervisor), Josh Eggleston (Township Manager), and Lori Castello (Township Planner)

Silver Maple Attendees: Joseph Brochu (Development Manager), John Panther (Development Manager)

Topics Discussed:

- Overview of Project site plan and timeline
- Proposed community benefits
- PA233 application process
- Status of discussions with Zeeland Planning Commission regarding workable ordinance draft
- Insight/concerns from Jamestown Township
- Zeeland Township Supervisor and staff stated desire to continue work on local ordinance adoption

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

Q. Describe Silver Maple's community outreach efforts in connection with the Project.

A. Silver Maple has compiled a summary of community outreach efforts regarding the proposed Project in **Appendix I**, **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 Silver Maple's commitment to transparent communication and collaboration with all stakeholders throughout the project development process.

Q. Describe the public meetings.

A. Silver Maple attended and participated in several town meetings, including Township planning commission meetings and board of trustee meetings. Refer to **Exhibit A-4.2** in **Appendix I** for a summary of the meetings, including the dates, attendees, and other applicable information such as meeting minutes and transcripts where available.

Q. Did Silver Maple conduct any additional community outreach not already addressed above?

A. Yes. In addition to the public meetings and community outreach discussed above, Silver Maple initiated a neighbor outreach campaign in September 2025, designed to inform, listen and respond to neighbors' questions and concerns about the Project. As a result of the neighbor outreach campaign, participating residents have influenced Project design by requesting increased setbacks, vegetative screening, and compensation. **Exhibits A-4.1 and A-4.2**, in **Appendix I**, contain a detailed summary of community outreach and education efforts, including identifying each participant as well as coordination and shared materials. Participants included:

Zeeland Township

Timeline of Outreach: June 2022 - Current

Initial Contact: Zeeland Township Board

Jamestown Township

Timeline of Outreach: September 2022 - Current

Initial Contact: Jamestown Planning Commission

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

A. Yes. On March 17, 18, and 19, 2026, Silver Maple held public meetings in Hudsonville and Zeeland, Michigan. Residents at the meetings raised concerns about the Project's haul route during school drop-off and pickup times. To address these public comments, Silver Maple will avoid using Byron Road during designated school drop-off and pickup times to the extent practicable. During school drop-off and pickup hours, Silver Maple will implement a "no-haul window" to minimize the impact of the Project on school bus operations. A copy of the public meeting transcript as well as the public meeting comment cards are attached. **Exhibit A-4.3**, in **Appendix I**, also includes a summary of the accommodations made by Silver Maple following public comments received.

Q. Did Silver Maple have a pre-Application meeting with Commission Staff?

A. Yes. Silver Maple met with Commission Staff on Tuesday, February 10, 2026, for the required pre-Application meeting. Additionally, Silver Maple 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 Silver Maple's agreements with participating landowners.

A. Silver Maple has acquired the rights to develop, construct, and operate an up to 200-MW alternating current solar project within 48 parcels of land. These land rights are granted by Collection Line, Lease, and Purchase Option agreements. Crossing agreements authorizing collection line installation are planned for 3 additional parcels owned by Consumers

Energy. Payments to landowners can be found at **Appendix I**, **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 Silver Maple 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 Silver Maple Project has solar panels sited within a fenced-in area of approximately 1,127 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.

As of the time of filing this Application, Silver Maple has not yet executed a Host Community Agreement ("HCA") with each ALU. Silver Maple remains committed to engaging in good faith negotiations with each ALU involved in the Project regarding the HCAs prior to the commencement of construction. However, if HCAs are not signed after good-faith negotiations with the townships, Community Benefit Agreements may be entered into with one or more community-based organizations providing benefits within or serving the residents of each ALU without a signed HCA.

Consistent with PA 233, any HCA will include an express provision in the Recitals that Silver Maple 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, Silver Maple contracted with Ginovus to conduct an economic and fiscal impacts analysis for the proposed Project. Ginovus concluded that cumulative revenues for local taxing districts would total an estimated $31.6 million over the Project's 35-year lifespan.

The estimated revenues would be paid to Ottawa County ($6.6 million), Jamestown Township ($1.6 million), Zeeland Township ($4.7 million), Hudsonville School District ($17.2 million), and State Education ($1.5 million). The Ginovus report is included in **Appendix I, Exhibit A-8.1**. See also **Appendix I, 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. 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 I.**

VII. TRANSMISSION AND INTERCONNECTION AGREEMENTS

Q. Has Silver Maple 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 I**, **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. Silver Maple, under my supervision and direction, has completed the minimum conditions form, included with the Application as **Appendix I**, **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 Silver Maple 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 I**, **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

* * * * *

In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22071

DIRECT TESTIMONY

OF

CAROL MCKNIGHT

ON BEHALF OF

SILVER MAPLE PV, LLC

APPENDIX II – EXHIBIT 2

April 3, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Silver Maple PV, LLC ("Silver Maple" or "Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Silver Maple Solar Project (the "Project"). The Project is a proposed solar energy facility that will include a nameplate capacity of up to 200 Megawatts of photovoltaic solar panels, to be located in Jamestown and Zeeland Townships, Ottawa 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 Silver Maple 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. Silver Maple's owner, RWE Americas, LLC f/k/a RWE Clean Energy, LLC ("RWE"), 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 June 2025. 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 the summer of 2025, 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 Silver Maple 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/Silver Maple 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 Silver Maple 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 in **Appendix I**: **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-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 Silver Maple Solar Project is a proposed 200-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 Jamestown and Zeeland Townships, Ottawa County, Michigan, near the cities of Zeeland and Hudsonville. The leased project boundary is approximately 1,914 acres, with Project construction limits of disturbance intended to occur on approximately 1,431 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 1,127 acres.

The Applicant is Silver Maple PV, LLC, a wholly owned subsidiary of RWE.

Along with my team at SWCA and with support from RWE, I prepared and reviewed **Exhibit A-2** (Project Description) included within Silver Maple'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 the cultivation of peaches (3.3 acres), cucumbers (2.7 acres), and blueberries (0.9 acres), among other uses, with limited road, forest, and wetland uses also present.

Based on SWCA's review, there are no 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 (except VanZoeren Woods, which falls outside of the Project Boundary but within the 1,000-foot buffer); or 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. As to major communication, utility uses, or infrastructure, the Project Area includes a 345 kilovolt ("kV") electric transmission line that bisects the Project Area north-to-south, under 100kV electric transmission lines, underground natural gas transmission pipelines, and a cell tower.

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**, **Exhibit A-2**, and **Exhibit 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 Silver Maple's plans and SWCA's ensuing environmental consultation.

As described in the accompanying **Exhibit 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 because it is committed to minimizing environmental disturbance by avoiding impacts to sensitive areas such as wetlands; streams; county drains; steep slopes; flood-prone zones; major rivers; cultural

sites; and habitats for rare, threatened, and endangered ("RTE") species to the maximum extent possible.

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 will be impacted), 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 U.S. 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 Jamestown Township's noise ordinance for solar energy systems. Zeeland Township and Ottawa County do not have sound standards specific to solar projects.

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 Silver Maple'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. The Project will introduce new visual elements into the landscape, which is predominantly agricultural with scattered wooded areas comprised of evergreen and deciduous trees, helping to block views of the Project from certain areas and breaking up expansive views of the modules. To further enhance visual appeal and ecological value, the area within the Project's fence line will be planted with a native pollinator seed mix. This vegetation will not only support pollinator habitats but also contribute to the Project Area's aesthetic. The selected species are expected to bloom from May through October, providing seasonal color and texture. Additionally, the Project has minimized the removal of existing woodlands and hedgerows. Areas of existing woodlands will be preserved to the greatest extent possible within the Project Area, further mitigating visual impacts by blocking views of the Project from certain areas and breaking up expansive views of solar modules.

One major consideration while developing the Project has been its proximity to the Ottawa Executive Airport - Z98. A glint and glare assessment was completed for the Project. Project photovoltaic arrays were designed with an antireflective surface and will be located to minimize potential glint and glare. Silver Maple will minimize visual impacts associated with the Project's solar arrays by using nonreflective surfaces. Solar array

support structures that are grouped together should be treated with the same colors, and color treatment selection for structures and transmission line poles should reduce contrast with the existing landscape.

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 Ottawa County Road Commission ("OCRC"); discussions, which are detailed with **Exhibit A-4.4** (Agency Consultations), are ongoing, including concerning the OCRC'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 Silver Maple'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-6.4**), Applicant has further conferred with the Ottawa County Water Resource Commissioner ("OCWRC"), with future meetings intended as the Project progresses; SWCA added details regarding its conference with the OCWRC to 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 explanation 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 Silver Maple 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 Silver Maple's approval, prepared **Exhibit A-1.15** (Participating Parcels), which includes lists of both participating and adjacent parcels and sets forth the relevant parcel identification number and owner name, with the Participating Parcel list also including overall parcel acreage. SWCA generated these lists relying on an Alta survey and public tax records available in October 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 Silver Maple, SWCA prepared the narratives included within both the Soil Survey Sampling and Analysis Plan (an Attachment to **Exhibit A-1.4**), and **Exhibit**

A-9 (Farmland Protection), the latter of which sets forth Silver Maple'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 90.8% of land within the Site Plan Boundary is presently utilized for agricultural row crops. Silver Maple'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 Zeeland Township, Jamestown Township, and Ottawa County.

The information within **Exhibit A-9** is true and complete to 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 Ottawa County and the proposed Project Area. Seven total reports—five covering Ottawa 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 Silver Maple 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 ("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 0.3 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, the Project has minimized the removal of existing woodlands and hedgerows and committed to seasonal tree clearing; consultation with MDNR is on-going regarding take of either bat species. SWCA opines that take of either bat species with potential to be located within the Project Area is unlikely.

Approximately 2.42 acres of nine isolated wetlands that could not reasonably be avoided will be directly impacted by solar arrays, grading for facilities, and an access road. These wetlands are presumed non-jurisdictional to the U.S. Army Corps of Engineers ("USACE") and EGLE. Of the nine wetlands, seven are farmed wetlands and two are located within farm field drainages. The Applicant is consulting with EGLE to confirm the jurisdictional status of the wetlands. If EGLE determines that any of the nine presumed isolated wetlands are jurisdictional, then the design will be amended to remove impacts that would require an individual EGLE permit and elevation to the U.S. Environmental Protection Agency ("USEPA") or USACE.

Additionally, it is proposed that approximately 50 linear feet (0.002 acre) of one drainageway (DB019), estimated to be jurisdictional to EGLE but not to the USACE, will be impacted for construction of an internal Project access road and will require an EGLE minor or general permit under Part 301 of PA 451. This drainageway is not a regulated county drain. Ten drains or ditches (approximately 3,379 feet in length and 0.13 acre in area), presumed to be non-jurisdictional to EGLE or USACE, will be impacted by construction of solar arrays, access roads, substation/switchyard, and collection line installation. These isolated linear features were identified within roadside ditches or agricultural fields but did not connect to other watercourses.

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 summarizes 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 Attachment 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.) Please also see my testimony in Section VII herein regarding six parcels that have not yet been fully surveyed due to safety and weather conditions and plans for surveying same.

Looking second to Protected Species and Habitats, the ECR accurately summarizes SWCA's review of information gained through the U.S. Fish and Wildlife Service ("USFWS") Information for Planning and Consultation ("IPaC"), with such information being included as Attachment B to **Exhibit A-6.2**. SWCA additionally consulted the Michigan Natural Features Inventory ("MNFI") electronic database, engaged in

discussions with MDNR staff (as further detailed in both **Exhibit A-6.2** (Environmental Compliance Report) 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 Biological Resource Report are both included as Attachments C and D, respectively, to **Exhibit A-6.2**. 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, the Project is not likely to adversely affect threatened or endangered species.

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 Attachment E to **Exhibit A-6.2**) did identify that two previously recorded archaeological sites, 20OT303/310 and 20OT340, are within the Project Area, though both sites will be avoided by all Project related activities. The ECR details SWCA's ongoing consultation with the State Historic Preservation Office ("SHPO") (which is also detailed within **Exhibit 4.4** (Agency Consultations)). SWCA and the Applicant anticipate that the SHPO will request both archaeology and historic architectural surveys after review of Silver Maple's PA 233 application. These studies will likely be required to identify any

resources that may be present within the Project Area and then document those resources with the SHPO prior to the MPSC's authorization of the Project. 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 the 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.

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, developed a Waste Analysis and Characterization Study which—as noted above—is included with **Exhibit A-1.3** (Explanatory Materials). 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.

SWCA prepared and the Applicant reviewed a Phase I Environmental Assessment to evaluate the potential for environmental risks associated with the Project. The assessment revealed no controlled recognized environmental conditions or historical recognized environmental conditions in connection with the Project Area. However, it did identify one recognized environmental condition ("REC") at the 5860 Byron Road property (Parcel No. 70-17-23-200-016). This property included a farmstead in the past, but it was demolished in 2006. The farmstead area was later graded and has been tilled since at least 2013, likely indicating its use for crop production since that time. SWCA's Phase I ESA found that past releases of waste oil and gasoline resulted in soil, surface water, and groundwater contamination for several chemicals and metals. The owner lit soil on the property on fire to burn off free product, but the fire department arrived and put out the fire with foam. While testing for Per- and Polyfluorinated substances ("PFAS") was not conducted, they have been the active ingredients in aqueous firefighting foam from the mid-1960s until recently, and, therefore, SWCA assumes that PFAS are present. Contaminated water was documented flowing west from the farmstead area in and along drainage tile and discharging to an off-site drainage ditch.

In 2003, a 1,000-gallon underground storage tank ("UST") of gasoline in the northern portion of the same parcel, along the west of a barn, was found to have leaked. The tank was later removed and backfilled. Groundwater that had seeped into the excavation was found to be contaminated. Apparently, removed soil had been placed back in the hole. Consequently, 166 tons of soil was then removed and disposed of in an off-site landfill. Documentation of completed remediation, close-out, or no further action letters from EGLE for the leaks or drainage tile water flowing from the contaminated area do not

appear to exist. For these reasons, leaks and spills at the on-site former farmstead at 5860 Byron Road were considered to be a REC for the Project Area. A copy of the Phase I ESA is provided in Attachment F to **Exhibit A-6.2**.

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, or 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. Joseph Brochu.

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 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 ambient noise monitoring at five representative locations across the Project Area during one 3-day period in fall 2025. As described within the **Exhibit A-1.7** narratives and accompanying report, the monitoring establishes a baseline 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 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 and a mitigation plan, which are included at Attachments F and G, respectively, of the Noise Technical Report portion of **Exhibit A-1.7**. These attachments detail post-construction testing and corrective or mitigation plan measures that will be implemented if 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 Ottawa County Emergency Management, the Zeeland and Jamestown Townships' Fire Departments, and the Ottawa County Sheriff's Office), the SWCA team and I drafted the

narratives and accompanying **Exhibit A-1.9** Emergency Response Plan ("ERP") and **Exhibit A-1.10** Fire Response Plan ("FRP") 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 are further detailed with **Exhibit A-4.4**.)

The ERP identifies potential hazards and 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 FRP similarly details local consultations 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 as 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 Silver Maple Project first initiated prior to SWCA joining the Project as a consultant in the summer of 2025. Indeed, RWE's planning for this Project had been ongoing for several years before SWCA's 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 five minor potential changes currently under consideration (other than potential changes to roads and collection lines within the current Project Area). The first possible change relates to wetland avoidance in 11 wetlands that are currently assumed to be non-jurisdictional to both the U.S. Army Corps of Engineers ("USACE") and EGLE. However, if EGLE determines that any of these wetlands are subject to state or federal jurisdiction, then the Project will be amended to remove impacts that would require an individual EGLE permit and/or elevation to review by the USACE.

The second potential change relates to the recognized environmental condition ("REC") that was identified at the former farmstead located at 5860 Byron Road. The property formerly contained residential and agricultural structures that were demolished in 2006. The area was subsequently graded and appears to have been used for crop production

since approximately 2013. The Phase I ESA prepared by SWCA identified evidence of past releases of waste oil, gasoline, and aqueous film forming foam, resulting in soil, surface water, and groundwater contamination exceeding applicable criteria for several constituents. Contaminated water was observed flowing westward from the former farmstead area through drainage tile and discharging into an off-site drainage ditch. Further evaluation of the property is ongoing and may necessitate future adjustments to the Project's design layout. As previously noted, any modifications will remain within the established LOD.

The third possible change is that the Applicant may pursue additional collection easements to establish a connection between the southern solar array block and the array blocks located to the northeast or northwest. This potential modification would not alter the current solar panel layout. The final cable route would depend on landowner participation; however, any installed collection line would be fully buried, ensuring that no visual impacts occur to the surrounding viewshed.

The fourth potential modification relates to six parcels that my team at SWCA could not safely access or fully assess. As such, SWCA will complete the required surveys within these parcels in spring 2026. To the extent that any wetlands or waterbodies are located within these parcels, Silver Maple will either avoid the applicable area(s) or coordinate with EGLE to acquire the necessary permits if avoidance is not possible.

The final possible modification is that Silver Maple may self-build the Project switchyard if ITC is unable to meet permitting timelines and the commercial operation date. In the case of a self-build, Silver Maple will obtain a Federal Energy Regulatory Commission ("FERC") waiver.

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 if 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 Cultural Resources UDP calls for training of construction supervisors 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 Natural Resources 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 consultation with Silver Maple and with its approval, SWCA prepared the Complaint Resolution Process included as an Appendix with **Exhibit A-1.16** (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 Silver Maple'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 and status updates at least every 30 days, with intended resolution within 60 days where possible) and commits Silver Maple to filing logs of complaints and resolution with the MPSC on a quarterly basis. The Plan includes Silver Maple'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

* * * * *

In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22071

DIRECT TESTIMONY

OF

GAUTAM SWAMYNATHAN

ON BEHALF OF

SILVER MAPLE PV, LLC

APPENDIX II – EXHIBIT 3

April 3, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Silver Maple PV, LLC ("Silver Maple" or "the Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Silver Maple Solar Project (the "Project"). Silver Maple is a wholly owned subsidiary of RWE Americas, LLC f/k/a RWE Clean Energy, LLC ("RWE"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 200 MW of photovoltaic solar panels, to be located within Jamestown and Zeeland Townships in Ottawa County, Michigan.

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

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

Q. Please summarize your educational background.

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

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

Q. Please summarize your professional experience.

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

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

A. In November 2025, I was staffed on the Project by RWE as a project manager. With respect to the Project, I have worked directly with the Applicant regarding construction and pre-construction related matters. In that capacity, my role has included managing the design of (and the contracting for) the Project in preparation for construction. My responsibilities as

pre-construction lead have also included planning for the procurement of relevant permits and analyzing local job creation and labor requirements.

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 I**: **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. Are you able to explain the Project's proposed construction and installation methods?

A. Yes—I am competent to explain the planned construction and installation methods described in my testimony below, which is consistent with the Commission's instructions and guidance.

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 as required by 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 meet or exceed that of pre-construction soil quality. **Appendix I, Exhibit A-1.4** includes the soil survey protocol plan.

The Applicant commissioned ANS Geo, LLC/ANS Geo, Inc. ("ANS") to conduct a geotechnical investigation for the Project (see **Appendix I, Exhibit A-1.4**). The

geotechnical investigation consisted of 28 total soil borings taken from the Project Area on August 5 through August 15, 2025. The investigation also included 13 electrical resistivity testing surveys, 9 test pit excavations, and 15 pile load tests. ANS completed laboratory testing for each component of the investigation, including thermal resistivity testing, corrosivity testing, California Bearing Ratio testing, direct shear testing, hydraulic conductivity testing, and soil index testing. The geotechnical investigations support Project planning, design, and constructability considerations based on an evaluation of the strength, compressibility, stiffness, and density characteristics of the soil in the Project Area.

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 adequate uniform perennial vegetation cover (as defined by the permit) has been reintroduced to all portions of the Project Area where ground disturbance occurred and there is no infrastructure.

Additionally, the Applicant has created a Standard Operating Procedure ("SOP") for the discovery and management of contaminant-impacted soils during the construction phase of the Project and its facilities. The SOP outlines the roles and responsibilities of Applicant's personnel and the construction contractor (or engineering, procurement, and construction ("EPC") contractor, to the extent contaminant impacted soil is detected during construction. The SOP 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 SOP is provided in **Appendix I, Exhibit A-1.4**.

The Applicant also commissioned SWCA Environmental Consultants ("SWCA") to complete a Phase I Environmental Site Assessment ("ESA") in January 2025 as a preliminary investigation of the Project Area environmental conditions. The Phase I ESA was conducted in accordance with the Environmental Protection Agency's ("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 previously described processes 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. The results of the assessment revealed RECs for past releases of waste oil, gasoline, and aqueous firefighting foam at the former farmstead located at 5860 Byron Road. At that location, soil; surface water; and groundwater contaminants above the applicable threshold for several chemicals and metals were detected. Further evaluation of the property is ongoing and may necessitate future adjustments to the Project design layout. Further information can be found in the Phase I Environmental Site Assessment in **Appendix I, Exhibit A-1.4** Phase I ESA, which I have reviewed.

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

A. The majority of the Project is 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. While exact grading depths are not known at this stage of development, it is anticipated that grading will involve cuts and fills within +/- 2 feet of existing grade. However, localized high- and low-grade areas may require greater depths/heights of cut and/or fill. In any case, slopes are anticipated not to exceed a 10% grade.

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 Applicant's 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 Project Area 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, and each associated tracker system will be supported by steel piles (the number of which is dependent on string length). 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 Michigan Environment, Great Lakes, and Energy ("EGLE"). Refer to Sheet 30 in **Appendix I, Exhibit A-1.1** for details and typical grading and excavation schematics for additional information.

Q. Describe the 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 and may include culverts.
- Private on-site access roads to the collector yard, switchyard, and operations and maintenance building, which will be approximately 20 feet wide. These will be constructed with a compacted subgrade, base aggregate material, and geotextile fabric (depending on soil conditions).
- Other private on-site access roads leading to inverters and transformers will be approximately 12 feet wide and constructed in the same manner identified immediately above.

Additionally, 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 public roadways.

In total, approximately 68,900 linear feet of internal access roads will be constructed. The Project does not anticipate using existing access roads. The final access road section depths and materials will be determined by the EPC contractor once the final design of the Project is completed.

Access roads within and around the Project Area will be designed with conventional stone and engineered to a thickness of 6 to 10 inches in order to support project construction and post-construction traffic, which (in the post-construction phase) will be composed primarily of light maintenance vehicles within the Project Area. 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 the proximity to existing roadways, a dedicated crane path is not anticipated.

During construction, the Applicant plans to create one 14.5-acre construction laydown and staging area for PV solar module construction and the substation. The laydown area will be prepared prior to the construction of access roads and may contain trailers, storage areas, a gravel parking lot, a water tank, generators/power service, communications, and trash and recycling. 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"). Internal access roads may remain after the completion of construction, but the laydown area(s) will be restored to pre-construction

contours and re-vegetated following construction if they are outside of the PV solar module areas.

In any case, temporary sediment and erosion control measures will be installed throughout the Project Area pursuant to the Project's final plans. Note, also, that trenches and drainage basin systems may also be constructed on an as needed basis 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 and each tracker connect to load breach disconnects ("LBD"). The number of trackers connected to one LBD varies, but by optimizing the physical and electrical design, one LBD can support 2 to 10 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 alternating current ("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 depths of the installed DC cables will be determined during final engineering but will 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 57 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 point of interconnection ("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 174,446 linear feet (33 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 164-linear-foot (0.03-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 I, 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 Underground infrastructure will consist of MV AC cables, DC cables, fiber optic cables, fiber pull boxes, piles (for trackers and inverters), ground rings, ground rods, and PVC conduit. The depth of the underground infrastructure will be determined during final engineering and in consultation with local regulatory bodies, but—in each case—will be a minimum of 48 inches below grade in accordance with the relevant NEC standard. Illustrative details for underground collection are contained throughout the Site Plan (**Appendix I, Exhibit A-1.1**), and additional notes concerning Solar Details & Construction Information are shown on Sheet 31 in **Appendix I**, **Exhibit A-1.1**.

III. PROJECT SCHEDULE

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

A. Once approved by the Commission, the Project's construction activities are expected to begin in the second quarter ("Q") of 2027. Construction is then expected to take approximately 1.5 years, with the anticipated completion date occurring in Q3 of 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:

Silver Maple Solar Project Development and Construction Schedule

Milestone	Date	Status
Queue Position Established	07/16/2020	Complete
Site Control Completed	9/5/2025	Complete
Environmental Studies Complete	Q4 2026	Expected
Technical Studies Complete	Q2 2026	Expected

Interconnection Agreement Executed	07/11/2023	Complete
Discretionary Permits Secured	Q2 2027	Expected
Financing Secured	Q2 2027	Expected
EPC Contract Executed	Q2 2027	Expected
Construction Start	Q2 2027	Expected
Pile Installation	Q2 2027-Q2 2028	Expected
Electrical Underground	Q2 2027-Q2 2028	Expected
Tracker Installation	Q3 2027 – Q3 2028	Expected
Module Installation	Q3 2027 – Q3 2028	Expected
Delivery & Installation of Main Power Transformer	Q3 – Q4 2027	Expected
Energization for Interconnection	Q2 2028	Expected
Commissioning and Regulatory Testing	Q3 – Q4 2028	Expected
Commercial Operation Date	Q4 2028	Expected

The Applicant's development efforts, including outreach to private landowners about the potential for executing long-term land leases for the Project, began in 2020. The same year, interconnection studies for the Project began and were completed in Q2 2023. Thereafter, the interconnection agreement was executed in Q4 2024 (refer to **Appendix I, Exhibit A-12**). Wildlife and environmental surveys began in September 2025 and continued through November 2025, with additional field studies planned to occur between Q1 and Q2 2026. The results of all completed studies are incorporated into the Application and discussed in the appropriate Exhibits to this Application.

Development of the present Application for submission to the MPSC commenced in Q3 2025 and is ongoing. The Application will be submitted to the MPSC in Q2 2026, with certification issued by the Commission occurring in approximately Q2 2027. The

Applicant anticipates that preparation of the final design, marked by completion of 90% of the design, will commence in Q3 2026 and will be completed during Q4 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 start with mobilization of construction staff and equipment to the Project site to begin clearing same, installing the erosion and sediment control measures, followed by any necessary grading of the ground. The laydown areas will then 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 (see **Appendix I, Exhibit A-1.1**). Electrical equipment will also 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 trailers, 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 on the Project and could affect financing, equipment procurement, seasonal construction windows, etc. Consequently, 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 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, lease options, 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 Silver Maples'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 Silver Maple's Application.

Financing Secured

The Project will secure 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. Please describe your role in acquiring the necessary permits for the Project and describe the same.

A. As part of my pre-construction responsibilities, I have also assisted in managing 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 agency responsible for 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:

Silver Maple Solar Project Permit List and Status Table

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	Q4 2026	Q2 2027
Part 31, Water Resources, of the Natural Resources and Environmental Protection Act – Permit by Rule (R 323.2190); Notice of Coverage National Pollutant Discharge Elimination System permit		Q4 2026	Q2 2027
Oversize/Overweight Vehicle Permit	Michigan Department of Transportation	Q4 2026	Q2 2027
Encroachment Permit		Q4 2026	Q2 2027
Public Act 116	Michigan Department of Agriculture and Rural Development	Q1 2026	Q2 2026
Drive Access Permit	Ottawa County Road Commission	Q4 2026	Q2 2027
Driveway Permit		Q4 2026	Q2 2027
Right-of-Way Permit		Q4 2026	Q2 2027
Transportation Permit		Q4 2026	Q2 2027
Road Use Agreement		Q4 2026	Q2 2027
Drain Crossing Permit	Ottawa County Water Resources Commission (OCWRC)	Q3 2026	Q2 2027
Part 91, Soil Erosion and Sediment Control, of the Natural Resources and Environmental Protection Act of 1994	Ottawa County Water Resources Commission (OCWRC)	Q4 2026	Q2 2027

Public Act 451, as amended, Soil Erosion Permit			
Stormwater Permit	Ottawa County Water Resources Commission (OCWRC)	Q3 2026	Q2 2027
Well and/or Sewage Disposal Construction Permit (if required)	Ottawa County Health Department	Q1 2026	Q1 2027
Building Permit	Zeeland Township	Q4 2026	Q2 2027
Electrical Permit	Zeeland Township	Q4 2026	Q2 2027
Mechanical Permit	Zeeland Township	Q4 2026	Q2 2027
Plumbing Permit	Zeeland Township	Q4 2026	Q2 2027
Building Permit	Jamestown Township	Q4 2026	Q2 2027
Electrical Permit	Jamestown Township	Q4 2026	Q2 2027
Mechanical Permit	Jamestown Township	Q4 2026	Q2 2027
Plumbing Permit	Jamestown Township	Q4 2026	Q2 2027
Utility Crossing Agreement	ITC	Q4 2026	Q2 2027
Utility Crossing Agreement	Consumers Power Company	Q4 2026	Q2 2027
Utility Crossing Agreement	SEMCO Energy Gas Company	Q4 2026	Q2 2027
Utility Crossing Agreement	ANR Pipeline Company	Q4 2026	Q2 2027
Utility Setback Agreement	Zayo Cell Tower	Q4 2026	Q2 2027

V. 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 Ottawa County by creating jobs in the community. The Applicant received estimates from Ginovus, a leader in economic development consulting, which estimated local economic impacts (including local employment) using the Jobs EQ Economic Impact Model (the "Model") created by Chmura. Among other economic benefits, the Model estimates that construction of the Project would directly support 250 jobs in Ottawa County, with an additional 156 indirect and induced jobs that would support local businesses throughout the construction phase while workers supported by the Project spend their wages in the local community. During

operation of the Project, an estimated three direct jobs would be created, and an additional three 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"), a collective bargaining agreement ("CBA"), or similar agreement, with one or more labor organizations prior to the start of construction. At this stage, Applicant has identified the Northern Midwest Regional Counsel of Carpenters ("NMRCC") as a potential signatory. Applicant contacted the NMRCC to introduce the Project and obtain a point of contact. Mike Barnwell, a local representative of NMRCC, provided a copy of their Solar Installation and Maintenance CBA and National Maintenance Agreement (refer to **Appendix I, Exhibit A-8.4**). The Applicant has prepared a letter of intent to utilize a PLA/CBA, which is provided in **Appendix I, Exhibit A-8.4**. Applicant further commits to providing a copy of the executed PLA/CBA 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.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22071

DIRECT TESTIMONY

OF

BLAKE HOLCOMB

ON BEHALF OF

SILVER MAPLE PV, LLC

APPENDIX II – EXHIBIT 4

April 3, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Silver Maple PV, LLC ("Silver Maple" or "the Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Silver Maple Solar Project (the "Project"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 200 MW of photovoltaic solar panels, to be located within Jamestown and Zeeland Townships in Ottawa 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 the Applicant'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 Silver Maple'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 I, Exhibit A-1.1** and **Appendix I, 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 I, 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, substation, switchyard, operations and maintenance (O&M) area and the primary laydown area.

In September and November 2025, comprehensive field investigations were conducted to identify wetlands, streams, floodplains and other waterbodies. All such waterbodies are reflected on Sheets 3 through 5 of the Site Plan (**Appendix I, Exhibit A-1.1**). The previously-described field investigations also found that a portion of VanZoeren Woods (located north of the I-196 highway) exists within the 1,000-foot Project buffer. However, no other major institutions, parks, or recreational areas within the 1,000-foot Project buffer were identified. As indicated above, the Site Plan contains dimensioned maps illustrating setbacks to proposed fencing, property lines, waterbodies, and occupied structures.

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 I, 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 the 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 I, 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;

(4) 500-foot voluntary setbacks from the inverter locations;

(5) 50-foot voluntary setbacks from wetland areas; and

(6) 50-foot voluntary setbacks from watercourses.

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 I, 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 I, Exhibit A-1.1**.

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

A. With the exception of VanZoeren Woods (a portion of which is located outside the Project Area but within the 1,000-foot buffer), 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 I, Exhibit A-1.1)**. Additionally, wetlands, streams, drains, and other aquatic features delineated during field reconnaissance are noted on Sheets 3 through 5 of the Site Plan in **Appendix I, Exhibit A-1.1**.

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

A. The Project is situated in Zeeland Township (to the west) and crosses the legal boundary into Jamestown Township (to the east) as noted in the Site Plan in **Appendix I, Exhibit A-1.1**. The Project is located entirely within Ottawa County, Michigan.

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

A. Yes. Aerial imagery was used to identify occupied or otherwise habitable structures, which are identified on the Site Plan as black boxes on Sheets 8 through 19 of **Appendix I, Exhibit A-1.1**. All such structures are assumed to be occupied, and a 300-foot setback was applied to same (see Sheet 6 of the Site Plan in **Appendix I, 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 I 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 8-19 in **Appendix I, 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 8 through 19 in **Appendix I, Exhibit A-1.1**. The primary proposed temporary laydown area is located on parcel PID: 70-17-13-300-004 as noted by Sheet 11 in **Appendix I, 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 11 of the Site Plan in **Appendix I, 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 8 through 19 of the Site Plan in **Appendix I, 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 1,126.88 acres (and a total Project Area of 1,914.4 acres). The Project will require installation of access paths and pads on property that has a current and predominate use as agricultural. 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 because of the Project.

The Applicant continues to coordinate with the Ottawa County Water Resource Commission ("OCWRC") regarding the Project's design approach and requirements. The design approach limits post-development impervious areas to the access paths, inverter pads, substation pad, switchyard pad and operations and O&M area. The Project (as planned) will result in adding 29.70 acres of impervious area over the site plan boundary area. The remaining areas within the limits of disturbance will consist of grassed open space in the post-development condition. The Project lies within Flood Zone X, and therefore no floodplain impacts are proposed**.**

SWCA, in tandem with the Applicant, also developed the Minimize, Mitigate, and Repair Plan ("MMR") contained within **Appendix I, 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. 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 in the Project Area. A comprehensive summary of soil types relative to the Project is shown on the NRCS soil survey provided in **Appendix I, Exhibit 6.4.**

Post-development peak flow rates from StormWise modeling software are summarized in Attachment E to **Appendix I, Exhibit 6.4**. Post-development results based on the preliminary layout indicate lower peak flow rates for the post-development

conditions at the boundary condition or tailwater locations for the Project. Post-development results based on the preliminary layout indicate that the runoff volumes for the post-development conditions are lower than the pre-development runoff volumes for the storm events evaluated across a majority of the Project. Higher runoff volumes were observed within the basins associated with the proposed substation pad, switchyard pad and operations and O&M **area.** Therefore, a conceptual sediment forebay and wet detention basin is proposed to mitigate higher runoff volumes for these basins. Post construction BMP locations, in addition to the conceptual sediment forebay and wet detention basin to serve runoff from the pad locations, will be determined during the detailed design phases by the EPC contractor to demonstrate conformity with OCWRC Site Development Rules.

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 OCWRC, 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 I, Exhibit A-6.4**, Silver Maple entered into a Cooperation Agreement with OCWRC on December 29, 2025. The Applicant will continue to coordinate with OCWRC during the design finalization to ensure the final design complies with the OCWRC Site Development Rules.

OCWRC's Site Development Rules require analysis concerning minimum water quality volumes, channel protection volumes, and flood protection volumes. SWCA evaluated water quality volumes using the Small Storm Hydrology Method (Ottawa County Water Resource Commissioner, 2021); the channel protection volume utilizing NRCS/TR-55 2-year, 24-hour storm event; and the flood protection volume and peak rates utilizing the NRCS/TR-55 100-year, 24-hour storm events. The peak volume and flow summaries are presented within **Appendix I, Exhibit A-6.4** for the pre-development and post-development drainage conditions. A hydrologic and hydraulic ("H&H") pre-development and post development study was completed utilizing the modeling software StormWise (Streamline Technologies, Inc., Version 4.08.03 2024), using Soil Conservation Service ("SCS") TR-55 methodologies to determine runoff Curve Numbers ("CNs") and time of concentration values, and using NRCS National Engineering Handbook ("NEC"), Part 630 to determine adjusted CNs in the post-development condition where photovoltaic panels are proposed. An SCS Type II 24-hour rainfall distribution was used for the pre-development and post-development H&H analyses.

The Plan is based on the Applicant's coordination with OCWRC and the above-described methodologies.

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 agricultural lands to meadows with disconnected gravel drives, limit grading to maintain 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 I, Exhibit 1.1** are designed to offer more space for runoff capture and filtration. In order to limit potential damage to existing drain tile infrastructure, 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 OCWRC/EGLE guidelines), which will ensure that there will be no net increase in runoff or adverse impacts to OCWRC drains resulting from the Project. Should it be determined that the Project design cannot accommodate the current location of existing drainage tile infrastructure, the MMR provides measures for relocation of drain tiles in a manner that will maintain or improve the current drainage function and not cause issues for the properties these systems serve.

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. Silver Maple will clean, clear, repair, or replace drains and culverts damaged by Project activity.

Finally, the MMR confirms that the Applicant 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 I, 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 26139C0335E and 26139C0345E (effective date 12/16/2011) and determined that the Project lies within Flood Zone X.

Elevations within the Project boundary range from approximately 760 feet NAVD88 to 674 feet North American Vertical Datum of 1988 ("NAVD88"). Using publicly available LIDAR topographical survey (United States Geological Survey, 2019), the overall watershed boundary was determined. The existing ground within the Project boundary generally drains both east (within the Kalamazoo River Watershed) and west (within the Macatawa River Watershed), discharging into a network of ditches and tributaries that flow through the proposed LOD as well as general overland flow towards lower topographic elevations.

Existing National Land Cover Database land cover types were identified within each basin and either confirmed or adjusted based on desktop verification. Composite runoff CN and time of concentration calculations were completed for each basin. H&H modeling was completed to simulate pre-development stages, routing, runoff volumes, and peak flows for each drainage basin across the Project using StormWise. Pre-development nodal connectivity was developed consistent with the existing conditions. Twenty-one time stage nodes were established to evaluate pre-development discharges from the Project Area and set tailwater and headwater conditions. Tailwater and headwater conditions were estimated based on the results of an Existing Conditions Hydrology Study prepared by Kimley-Horn and Associates, Inc., dated August 2025 (revised November 2025).

The results of SWCA's pre-development drainage analysis are contained in Section 3.1 and Attachments C and E within **Appendix I, 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 and Attachments D and E of **Appendix I, 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

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22071

DIRECT TESTIMONY

OF

MATT PIERCE

ON BEHALF OF

SILVER MAPLE PV, LLC

APPENDIX II – EXHIBIT 5

April 3, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Silver Maple PV, LLC ("Silver Maple" or "the Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Silver Maple Solar Project (the "Project"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 200 MW of photovoltaic solar panels, to be located within Jamestown and Zeeland Townships in Ottawa 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, 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 with respect to 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** in **Appendix I**, 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 exhibit 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 1,126 acres (and a total project area of approximately 1,914 acres), including the installation of access paths and paths on property that has a current and predominate use as agricultural. Approximately 29.70 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 Ottawa County Water Resource Commission ("OCWRC") will necessarily continue prior to and during construction, the Stormwater Mitigation Report summarizes OCWRC 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 volume and flow analysis for 24-hour storm events have 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 OCWRC 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

* * * * *

In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22071

DIRECT TESTIMONY

OF

RYAN RUPPRECHT

ON BEHALF OF

SILVER MAPLE PV, LLC

APPENDIX II – EXHIBIT 6

April 3, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. On whose behalf are you providing this testimony?

A. I am submitting testimony on behalf of Silver Maple PV, LLC ("Silver Maple" or "the Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Silver Maple Solar Project (the "Project"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 200 MW of photovoltaic solar panels, to be located within Jamestown and Zeeland Townships in Ottawa County, Michigan.

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

A. Since January 2022, I have been employed by SWCA Environmental Consultants, most recently as a Principal Project Manager. In this 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. I have also 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 I**: **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 I, Exhibit A-13.1** and **Exhibit A-13.2**. 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 I, Exhibit A-13.1**. 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 Ottawa 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 I, Exhibit A-13.2**. SWCA estimates that the revenue derived from salvage will total $1,789,582.00. 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.