WALKER ROAD SOLAR FARM LLC

APPENDIX II

DIRECT TESTIMONY

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of WALKER ROAD SOLAR FARM LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22130

DIRECT TESTIMONY

OF

KEVIN COLE

ON BEHALF OF

WALKER ROAD SOLAR FARM LLC

APPENDIX II – EXHIBIT 1

May 29, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Walker Road Solar Farm LLC ("Walker Road" or "the Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Walker Road Solar Project (the "Project"). Walker Road 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 150 MW of photovoltaic solar panels, to be located within Bingham Township in Clinton County, Michigan.

Q. Please summarize your professional experience.

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

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

A. Yes, I have provided written testimony for the Commission's consideration in other solar siting case pending before the MPSC, *e.g. Rouget Road Solar Farm, LLC*, Case No. U-22003.

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

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

Q. What is RWE?

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

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

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

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

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

Day-to-day, I manage all core development disciplines. That includes securing and maintaining site control, negotiating and refining land agreements, working directly with

landowners, and guiding engineering teams as we advance project design from preliminary layouts toward Issued for Construction ("IFC") ready plans. I coordinate closely with environmental, permitting, civil, electrical, interconnection, procurement, and construction teams, both internal subject matter experts and external consultants, to keep the project on schedule and aligned with state, county, and local requirements.

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

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

In short, my responsibility is to take a large utility-scale project-often hundreds of millions in investment-from early-stage development through permitting and construction readiness in a coordinated, commercially viable, and technically sound manner.

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

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

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

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

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

In addition, my role requires that I work closely with our internal SMEs and external consultants to align civil and electrical design, environmental studies, permitting requirements, and project risk management. In short, my role as Project Development Manager for Walker Road 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 Walker Road 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) **Jack Comer**, a Civil Analyst and Project Manager at Kimley Horn and Associates ("Kimley-Horn"), addresses the Site Plan, Area Land Use, and the Project's Stormwater Mitigation Plan.

(4) **Liam Sawyer**, a Senior Energy Practice Leader at Kimley-Horn, addresses the Planned Facilities/Site Plan, Area Land Use, and Stormwater Mitigation Plan.

(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 Walker Road's Application (the "Application") as well as the exhibits attached thereto. Among other things, I assisted in the preparation of the Application and in the review and acceptance of the exhibits referenced in my testimony.

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

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

purview as to some or all of the content of the foregoing exhibits as set forth in their respective testimonial submissions.

III. PROJECT OVERVIEW AND SITE PLAN

Q. Please provide an overview of the Project.

A. The Project will consist of both solar panels and inverters arranged in photovoltaic (PV) arrays, as well as associated facilities and infrastructure. When installed, the Project will have a nameplate capacity of up to 150 MW, with the solar arrays located within an approximately 751-acre fenced project area. The associated facilities and infrastructure include the Project substation, operations and maintenance building, overhead transmission line to point-of-interconnection, underground electrical cables to the Project substation, perimeter fencing, temporary and permanent stormwater basins, laydown yards for construction, and access roads to each PV array and the Project substation. A full description of the Project is included within the Application at **Appendix II**, **Exhibit A-2.**

Construction of the Project is expected to begin in 2027, with commercial operation anticipated by December 2028, subject to receipt of all required permits, interconnection approvals, financing, and procurement timelines.

The proposed locations of the solar arrays and other infrastructure are shown in the Site Plan included with the Application at **Appendix II**, **Exhibit A-1.1**, which exhibit Walker Road 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 Clinton County in Bingham Township, Michigan, approximately 1 mile northeast of St. Johns and 6 miles west of Ovid.

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, 3% woody wetlands, 3% low-intensity development, 2% deciduous forest, 2% open space development, and less than 1% of other land cover types including medium intensity development and hay/pastures.

According to the 2020 U.S. Census, Bingham Township is home to a small, close-knit population. The local economy is largely driven by agriculture, with additional employment in manufacturing, education, health care, and retail services. The nearby communities of St. Johns and Ovid provide additional infrastructure, services, and workforce support for the region. Clinton County reflects a blend of rural character and small-town amenities, making it a suitable location for renewable energy development. According to the 2020 U.S. Census, Bingham Township has a population of approximately 2,919 residents. Land-cover percentages derived from NLCD 2021. These values provide current context for the Project within township and county land use. Refer to **Appendix II, Exhibit A-2** for the Project Description.

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

A. As of the date of this Application, there is currently one utility-scale solar facility sited within Bingham Township. This solar facility has an area of approximately 110 acres.

Bingham Township has an area of approximately 20,742 acres, so the percentage of land within the township dedicated to energy generation is 0.5%. Clinton County contains one utility-scale solar facility, one biomass power plant, and one refined petroleum product pipeline terminal. Acreage estimates were derived from mapped facility boundaries and publicly reported parcel information. To the extent precise acreage data are unavailable, the Applicant has conservatively characterized the overall percentage of county land devoted to energy generation as minimal. Excluding the proposed Walker Road Solar Farm Project, existing energy facilities in Clinton County occupy fewer than 1,000 acres of the total 363,072 acres within the county. Based on publicly available information, less than approximately 0.28% of the county's land area is currently associated with utility-scale energy generation facilities, excluding the Project. Refer to **Appendix II, Exhibit A-2** for the Project Description

IV. ALTERNATIVES AND CHANGES

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

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

Key to the consideration of alternatives were six key factors: strong solar energy potential, proximity of adequate interconnection to the electricity grid, willing landowners, accessible sites, compatible land use, and limited environmental constraints. The Project satisfied the evaluation criteria in a variety of ways, including the availability of sufficient

acreage, proximity to a desirable point of interconnection, and the willingness of local landowners to participate in the Project. Within **Exhibit A-1.5**, we additionally detail several internal reconfigurations adopted during the design process, e.g., to avoid or minimize direct environmental or other undesired impacts, comply with applicable setbacks from public roads, and exclude parcels where landowners declined participation.

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

A. The Project team and I coordinated input from RWE and made use of our own prior experience in project development in evaluating anticipated potential changes to the Project as set forth in **Appendix II**, **Exhibit A-1.6** of the Application. Such potential changes include changes in location to avoid regulated wetlands, changes to access road locations to address landowner requests and utility crossing agreements, and changes to the substation location.

V. PROJECT DEVELOPMENT AND COMMUNITY OUTREACH

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

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

(1) **Local Residents**: Walker Road has been meeting with prospective landowners and nearby residents since mid-2019 to determine local interest in the Project, address local concerns and answer questions about the Project and Walker Road, and to secure land rights. Walker Road also met with, or attempted to meet with, all non-participating adjacent residences to the Project.

(2) **Local Units of Government**: Since May 2023, Project representatives have attended meetings with the Clinton County Chamber of Commerce, Clinton County

Planning Commission and Board of Commissioners, and the Bingham Township Board to advise them of the Project, understand potential concerns, keep them apprised of the development schedule, and discuss community benefit agreements.

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

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

A. Yes. Walker Road 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 December 19, 2024, Walker Road sent letters via email and certified mail to Robert Showers, Board of Commissioners Chairperson, Clinton County, offering to meet with the County to discuss the Project and whether the County has a Compatible Renewable Energy Ordinance ("CREO"). On February 10, 2025, Walker Road Solar sent a letter via email and certified mail to J. Eric Silm, Bingham Township Supervisor, offering to meet with the Township to discuss the Project and whether the Township has a CREO. The meeting invitations were not limited in scope and included opportunities for discussion of community benefits, project timelines, opportunities for collaboration, and anything else of interest to the ALU. **Exhibit A-4.1**, **Appendix II**, includes a copy of the offer to meet with the legislative body of the affected ALUs.

Q. Did Walker Road conduct meetings with the affected ALU?

As of the date of this filing, Walker Road has not received responses to the letters it sent to Messrs. Showers and Silm on December 19, 2024, and February 10, 2025, respectively.

Pursuant to Public Act 233 and the Michigan Public Service Commission's Application Filing Instructions and Procedures, Attachment C-1, Walker Road is proceeding on the assumption that neither of the affected local units have a CREO. Although Walker Road has not received responses to the letters referenced above, it has conducted the following meetings with the affected ALUs

Clinton County

Date: January 16, 2025

Location: Virtual Meeting

County Attendees: Bruce Delong – County Chairman, John Fuentes – County Admin, Laura Genovich – Foster Swift Counsel

RWE Attendees: Joseph Brochu – Development Manager, Lindsey Ewig, Development Manager, Michael Vogt – Dickinson-Wright, PLLC, Dave O'nofrio – RenUSA

Topics Discussed:

- Overview of Project site plan and timeline
- Insight/concerns from Clinton County

Bingham Township

Date: April 9, 2025

Location: Bingham Township Hall, 2057 North Lansing Street, St Johns, MI 48879

Township Attendees: J. Eric Slim – Township Supervisor, Eric Harger – Township Trustee

RWE Attendees: Joseph Brochu – Development Manager, Michael Vogt – Dickinson-Wright, PLLC, Dave O'nofrio – RenUSA

Topics Discussed:

- Overview of Project site plan and timeline
- Insight/concerns from Bingham Township

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

Q. Describe Walker Road's community outreach efforts in connection with the Project.

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

Q. Describe the public meetings.

A. Walker Road attended and participated in several town meetings, including citizens advisory meetings, planning commission meetings, and board meetings (among others). Refer to **Exhibit A-4.2** in **Appendix II** for a summary of the meetings, including the dates, attendees, and other applicable information such as meeting minutes and transcripts where available.

Q. Did Walker Road conduct any additional community outreach not already addressed above?

A. Yes. In addition to the public meetings and community outreach discussed above, Walker Road from May 2024 through November 2024, conducted targeted neighbor outreach focused on landowners abutting the project area. This effort primarily consisted of door-to-door engagement, during which Neighbor Agreements were presented to identified adjacent landowners. In addition, Walker Road developers participated in outreach activities, particularly along the M-21 corridor, where engagement focused on establishing communication channels. **Exhibits A-4.1 and A-4.2**, in **Appendix II**, contain a detailed summary of community outreach and education efforts, including identifying each participant as well as coordination and shared materials. Participants included:

Clinton County and Bingham Township

Timeline of Outreach: October 2023 - Current

Initial Contact: Danielle Schrader, Chamber of Commerce Director (Clinton County)

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

A. At this time, Walker Road has not identified any Project design modifications resulting directly from comments received during the public informational meeting. Walker Road held a public informational meeting for the Project on January 21, 2026 in St. Johns, Michigan. Walker Road did not receive comments or requests regarding changes or accommodations for the Project during the public informational meeting. As such, no accommodations or changes have yet been made or proposed to the Project design to address same. A copy of the public meeting transcript as well as the public meeting comment cards are attached. **Exhibit A-4.3**, in **Appendix II**.

Q. Did Walker Road have a pre-Application meeting with Commission Staff?

A. Yes. Walker Road met with Commission Staff on February 5, 2026 for the required pre-Application meeting. Additionally, Walker Road 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 Walker Road's agreements with participating landowners.

A. Walker Road has acquired the rights to develop, construct, and operate an up to 150-MW alternating current solar project within 34 parcels of land. These land rights are granted by Collection Line, Lease, Lease with Purchase Option, and Purchase Option agreements. Payments to landowners can be found at **Appendix II**, **Exhibit A-8.2-Confidential**.

Q. How will participating landowners to be compensated?

A. Payments will be provided to landowners of participating properties as part of the development of the proposed Project, which will provide the property owners with a stable income stream. The expected payments to participating property owners are structured to reflect fair compensation for the use of their land allowing for continued compatible agricultural uses where feasible. 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 Walker Road Project have chosen voluntarily to include their property in the Project through one of the following real estate arrangements:

Collection Line, Lease, Lease with Purchase Option, and 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 Walker Road Project has solar panels sited within a fenced-in area of approximately 751 acres. The annual Production Term Payments to landowners are assessed based on the portion of the Property where solar panels have been sited.

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

A. As of the time of filing this Application, Walker Road has not yet executed a Host Community Agreement ("HCA") with Clinton County ("County"). Walker Road remains committed to engaging in good faith negotiations with the County regarding the HCA prior to the commencement of construction. However, if the HCA is not signed after good-faith negotiations with the County, a Community Benefit Agreement may be entered into with one or more community-based organizations providing benefits within or serving the residents of Clinton County without a signed HCA.

Consistent with PA 233, the HCA will include an express provision in the Recitals that Walker Road will pay Clinton County $2,000 per megawatt of nameplate capacity. The funds are to be used as determined by the County for police, fire, public safety, or other infrastructure, or for other projects as determined by the County.

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, Walker Road contracted with Strategic Economic Research, LLC ("SER") to conduct an economic and fiscal impacts analysis for the proposed Project. SER concluded that if the Project qualifies for and receives a Solar Energy Facility Exemption Certificate (SEFEC), cumulative revenues for local taxing districts would total an estimated $25.5 million over the Project's 35-year lifespan. This would represent an increase of roughly $20.4 million over the estimated $5.1 million that would be collected in the absence of the Project. The estimated revenues will be paid to Clinton County ($12.9 million), Bingham Township ($3.5 million), St. Johns Public Schools ($8.2 million), and the Briggs District Library ($0.9 million).

SER's Report is included in **Appendix II, Exhibit A-8.1**. See also **Exhibit A-1.3 Socioeconomic and Environmental Justice Assessment**.

Energy, Capacity, Reliability, and Resource Adequacy Needs: The Project will significantly contribute to Michigan's identified energy, capacity, reliability, and resource adequacy needs. Solar energy generation contributes to the stability and availability of energy resources within the state of Michigan, while promoting energy efficiency and community benefits that are brought upon by solar energy development. Unlike other energy generation facilities, solar energy facilities do not consume fuel and require less land than traditional power plant infrastructure. Michigan has set ambitious renewable

energy goals, aiming for 50% renewable energy by 2030 and 60% by 2035. The ultimate goal is to achieve 100% clean energy statewide by 2040. This includes transitioning utility providers to 100% carbon-free energy generation by that year. The design and purpose of this Project align with Michigan's energy targets and works towards a more resilient power grid. See **Exhibit A-8.5, Appendix II.**

VII. TRANSMISSION AND INTERCONNECTION AGREEMENTS

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

A. Yes. The required information related to power transmission and interconnection, including the facility's queue number for identification within the interconnection queue, is included in the executed generator interconnection agreement provided in **Appendix II**, **Exhibit A-12**. This executed agreement is being provided in lieu of the otherwise referenced studies.

VIII. MINIMUM CONDITIONS AND APPLICATION COMPLETION

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

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

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

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

IX. CONCLUSION

Q. What are your recommendations to the Commission?

A. I recommend approval of the Application as submitted.

Q. Does this conclude your direct testimony?

A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of WALKER ROAD SOLAR FARM LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22130

DIRECT TESTIMONY

OF

CAROL MCKNIGHT

ON BEHALF OF

WALKER ROAD SOLAR FARM LLC

APPENDIX II – EXHIBIT 2

May 29, 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 Walker Road Solar Farm LLC ("Walker Road" or "Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Walker Road Solar Farm Project (the "Project"). The Project is a proposed solar energy facility that will include a nameplate capacity of up to 150 Megawatts of photovoltaic solar panels, to be located in Bingham Township, Clinton 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 Walker Road Project now at issue. This has included consulting in support of multiple large-scale solar projects in the Midwest. I joined my current firm, SWCA Environmental Consultants ("SWCA") in March 2023,

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

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

A. Yes, I have provided written testimony for the Commission's consideration in other solar siting cases pending before the MPSC, e.g. Rouget Road Solar Farm, LLC, Case No. U-22003, and Silver Maple PV, LLC, Case No. U-22071.

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. Walker Road'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 SWCA 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 Walker Road Project Application to the MPSC, and otherwise preparing and supporting permit applications related to the Project. In that role, I have coordinated with the RWE/Walker Road and other vendor teams, as well as with SWCA's internal technical experts and staff, and I have overseen the overall preparation of the Application, its exhibits, and the development of the Application narratives.

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

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your direct testimony?

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

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

A. I am sponsoring, and/or have testimonial purview, as to the following exhibits in **Appendix I**: **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 Walker Road Solar Project is a proposed 150-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, 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 Bingham Township, Clinton County, Michigan, near the cities of St. Johns and Ovid. The leased Project boundary is approximately 1,577 acres, with Project construction limits of disturbance ("LOD") intended to occur on approximately 1,342 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 will be approximately 751 acres.

The Applicant is Walker Road Solar Farm 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 Walker Road's Application. That exhibit sets forth additional details regarding the proposed Project and site plan and expected land uses within the Project Area.

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

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

As described in the accompanying **Exhibit A-1.3** narrative, the Project has been thoughtfully designed to align with and protect the natural environment. The Applicant will implement 25-foot setbacks around wetlands and streams from the LOD 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, together with TRC Environmental Corporation ("TRC"), further conducted multiple assessments, including through field work and desk study, to assure that the Project will comply with state and federal natural resource laws 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 areas 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 the applicable MPSC limit. Clinton County's noise ordinance for solar energy systems is more restrictive than the MPSC's limit, so Applicant's compliance with noise limits is demonstrated under the governing State standard. Bingham Township does 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 Appendix A to **Exhibit A-1.3**. The narrative describes Walker Road's plans, as developed in concert with SWCA, concerning mitigating measures to reduce visual impacts, including the use of anti-glare coating on panels, native pollinator-friendly vegetation for landscape screening, as well as other measures. 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 will also contribute to the Project Area's aesthetic. The selected species are expected to bloom from April 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.

A glint and glare assessment was completed for the Project. The Project's photovoltaic arrays were designed with an antireflective surface and will be located to minimize potential glint and glare. 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 narrative 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 Michigan Department of Transportation ("MDOT") and the Clinton County Road Commission ("CCRC"); discussions, which are

detailed with **Exhibit A-4.4** (Agency Consultations), are ongoing, including concerning the CCRC's ultimate input on traffic management plans.

SWCA further reviewed the narrative and accompanying appendices describing intended measures to avoid impacts to local drainage (including Walker Road's planned Minimize, Mitigate, and Repair ("MMR") Assessment related to drainage) and to neighboring parcels generally. In connection with reviewing and approving its MMR Assessment and Stormwater Mitigation Plan (see **Exhibit A-6.4**), Applicant has further conferred with the Clinton County Drain Commission ("CCDC"), with future meetings intended as the Project progresses; SWCA added details regarding its conference with the CCDC to the Agency Consultation Summary in **Exhibit A-4-4** 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 environmental justice ("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 EJ-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 Walker Road to secure its own approval for inclusion of each such element as part of the Application. The narratives and appendices included with **Exhibit A-1.3** set forth

reasonable and appropriate mitigation measures for the Project. Additionally, the exhibit and appendices are true and complete to the best of my knowledge and belief.

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

A. Together with the SWCA team and Kimley Horn, I prepared, and Applicant approved, **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. The Participating Parcel list also includes the fenced-in acreage within each parcel. SWCA generated these lists relying on an Alta survey and public tax records available in May 2024, 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.

In consultation with Walker Road, SWCA prepared the narrative included in **Exhibit A-9** (Farmland Protection), which sets forth Walker Road's plans for how the Project will avoid unreasonably diminishing farmland, including farmland identified in the Soil Sampling and Analysis Plan. The Exhibit A-9 narrative explains that 97.3% of land within the Site Plan Boundary is presently utilized for agricultural row crops. Walker Road's plans include, among other measures, minimizing grading to prevent unnecessary compaction, and applying pollinator-friendly vegetation mixes to absorb precipitation and confer other benefits.

The exhibit describes current farmland uses within the Project Area based on US Department of Agriculture National Agriculture Statistics Service information gathered by

SWCA and relates this information—as well as the overall Project Site acreage—to current agricultural profiles within Bingham Township and Clinton 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 Clinton County and the proposed Project Area. Six total reports—four covering Clinton County and two focused on the Project Area (with and without the 1,000' 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) provided by TRC, SWCA in tandem with Walker Road developed the Environmental Compliance Report ("ECR") included as an Appendix at **Exhibit A-6.2** with the Application.

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

The ECR describes the results of TRC's field and TRC's and SWCA's 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 approximately 9.64 acres of non-contiguous areas, 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 are no anticipated direct impacts 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 3.34 acres of four isolated wetlands/wetland complexes that could not reasonably be avoided will be directly impacted by solar arrays, grading for facilities, and fencing. These wetlands are presumed non-jurisdictional to the U.S. Army Corps of Engineers ("USACE") and EGLE. The Applicant is consulting with EGLE to confirm the

jurisdictional status of the wetlands. If EGLE determines that any of the four 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 300 linear feet (0.07 acre) across five streams and county-regulated drains, estimated to be jurisdictional under both the EGLE and the USACE, will be impacted by four new access road crossings and improvements to one existing access road crossing. These activities will require an EGLE minor or general permit under Part 301 of Public Act 451. All five streams are also regulated as county drains. No additional direct impacts to estimated regulated wetlands, streams, or county drains are proposed.

The Project otherwise maintains a 25-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 TRC 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 to inform the design layout and avoid and minimize impacts to the same. Project design buffers, however, have been implemented based on desktop data to avoid direct impacts to such regulated resources.

Looking second to Protected Species and Habitats, the ECR accurately summarizes SWCA's review of information gained through the 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**. TRC additionally consulted the Michigan Natural Features Inventory ("MNFI") electronic database and conducted an on-site habitat assessment and desktop review, which culminated in the Site Characterization Report. (See Attachment D to Exhibit A-6.2.) The results of the MNFI consultation were used by SWCA to engage in discussions with MDNR staff (as further detailed in both **Exhibit A-6.2** (Environmental Compliance Report) and **Exhibit 4.4** (Agency Consultations)). The MNFI results and Site Characterization 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 the 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 ("NRHP") databases and other resources in seeking to identify whether there are known cultural resources within the Project Area. There are no cemeteries recorded in the Project Area. Similarly, no NRHP eligible or listed resources were identified in the Project Area. Within a 1-mile buffer of the Project, one NRHP listed property, the Giles J. Gibbs Building, and one NRHP eligible historic district, the St. Johns Downtown Historic District, are present. Desktop review revealed two previously recorded archaeological sites, 20CL139 and 20CL177, within the Project boundary, though the Project has been designed to avoid both sites. Moreover, both sites were determined not eligible for listing in the NRHP by the Michigan State Historic Preservation Office ("SHPO"). SWCA's Cultural Resources Desktop Review is included as Attachment E to **Exhibit A-6.2**. The ECR details SWCA's ongoing consultation with the SHPO, which is also detailed within **Exhibit 4.4** (Agency Consultations).

The SHPO has requested both archaeology and historic architectural surveys after reviewing Applicant's PA 233 application. These studies are 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, if requested. 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 that—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. 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, including NREPA. 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. J. Kevin Cole.

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

Q. Please describe the 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 four representative locations across the Project Area during August 21-23, 2025. As described within the **Exhibit A-1.7** narratives and accompanying report, the monitoring establishes a baseline for post-construction comparison. As detailed in the report, 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 Clinton County Emergency Management, the St. Johns Fire Department, and the Clinton 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 narrative, 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 16 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 post-construction lighting to only the operations and maintenance ("O&M") building, and substation, with motion sensors and timers to further reduce hours of lighting. Fixtures at the O&M building, and substation 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 Walker Road 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 three potential changes currently under consideration. The first possible change relates to wetland avoidance in four wetlands/wetland complexes that are currently assumed to be non-jurisdictional to both the 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 solar panels and grading activities within the jurisdictional wetlands. Impacts associated with collection lines, road crossings, or temporary construction access would remain, and Applicant will obtain all required permits from EGLE.

The second potential change relates to access road locations that may change due to feasibility, landowner requests, utility crossing agreements, and approval from the Clinton County Drain Commissioner. Any modifications will remain within the established LOD and will not create additional environmental impacts.

The third and final possible modification is that Applicant may relocate the substation to another parcel within the Project's LOD if Applicant determines that this modification would optimize the Project from an engineering, construction, and/or cost perspective. If Applicant relocates the substation, it will modify the current solar panel layout. However, all modifications related to the potential substation relocation will occur within the current LOD and will not trigger additional environmental impacts.

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, operation, or decommissioning. 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 in the event that unanticipated historic or cultural resources or human remains are discovered. It also identifies instances when the Michigan SHPO should be notified based on a determination of significance, or when local law 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, surface waters, floodplains, vernal pools, sensitive habitats, wildlife corridors, and threatened or endangered species.

VIII. COMPLAINT RESOLUTION

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

A. In consultation with Walker Road 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 Walker Road's planned complaint review process, which will include determining if complaints relate to violations of laws or permit conditions, and if notifications are required to the MPSC or other entities resulting from the complaint. The process sets forth timelines (5 business days for acknowledgment and status updates at least every 30 days, with intended resolution within 60 days where possible) and commits Walker Road to filing logs of complaints and resolution with the MPSC on a quarterly basis. The Plan includes Walker Road's promulgated complaint form as well.

IX. SIGNAL MITIGATION

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

A. My team and I prepared a Signal Mitigation Plan included with the Application at **Exhibit A-7**. As described in the accompanying narrative and within the Plan itself, the Project is not reasonably expected to produce electromagnetic interference or to disrupt communication systems. The planned inverters for the Project are designed and certified to operate without causing harmful interference. The Plan also describes multiple mitigation measures, such as housing inverters and electrical components in grounded, shielded enclosures that will 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 WALKER ROAD SOLAR FARM LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22130

DIRECT TESTIMONY

OF

GAUTAM SWAMYNATHAN

ON BEHALF OF

WALKER ROAD SOLAR FARM LLC

APPENDIX II – EXHIBIT 3

May 29, 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 Walker Road Solar Farm LLC ("Walker Road" or "the Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Walker Road Solar Farm Project (the "Project"). Walker Road 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 150 MW of photovoltaic solar panels, to be located within Bingham Township in Clinton 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 Terracon Consultants ("Terracon") to conduct a geotechnical investigation for the Project (see **Appendix I, Exhibit A-1.4**). The

geotechnical investigation consisted of 30 total soil borings taken from the Project Area during mid-2024 at a depth of 20 feet, with 20 cone penetration test soundings at a depth of 20 feet. The previously described samples underwent various lab testing, including moisture content, unconfined compressive strength, grain size analysis, chemical analysis, thermal resistivity, corrosion, California Bearing Ratio, and Atterberg limits. These geotechnical investigations support evaluation of the strength, compressibility, stiffness, and density characteristics of the soil in the Project Area as well as the general suitability of the proposed Project equipment.

Disturbed areas will be seeded to stabilize the Project Site after construction is completed. The Project will be considered stabilized when soil disturbance is finished and adequate uniform perennial vegetation cover (i.e., a cover density of 70%) 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 Attachment C to **Appendix I, Exhibit A-1.4**.

The Applicant also commissioned SWCA Environmental Consultants ("SWCA") to conduct a Phase I Environmental Site Assessment ("ESA") as a preliminary investigation of the Project Area environmental conditions. The ESA is currently underway. The Phase I ESA is being 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").

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 5 to 10 feet.

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 Sheets A-1.40 and A-1.41 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 per Clinton County standards may be up to 110 feet wide and may include culverts;
- Private on-site access roads to the Project will be approximately 20 feet wide. These roads will be lined with geofabric and covered with 12 inches of gravel;
- Other private on-site access roads leading to inverters and transformers will be approximately 12 to 16 feet wide, consisting of compacted soil or gravel.

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 52,000 linear feet of internal access roads will be constructed. The final location and length of these internal access roads will depend on the final site design issued for construction but will be within the Project Area. Access roads within and around the Project Area will support a maximum vehicle load of 80,000 pounds and will be designed with conventional stone at least 6 to 10 inches thick and engineered to support Project construction as well as postconstruction traffic which will be primarily light maintenance vehicles. 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 construction laydown and staging areas for PV solar module construction and the substation, which will total approximately 6.5 acres. The laydown areas 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 revegetated 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 break 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 37 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 56,200 linear feet (10 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 1,000-linear-foot (0.2-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 construction details are shown on Sheets A-1.40 and A-1.41 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 18 months, 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:

Walker Road Solar Farm Development and Construction Schedule

Milestone	Date	Status
Queue Position Established	06/22/2023	Complete
Site Control Completed	11/01/2024	Complete
Environmental Studies Complete	Q3 2026	Expected
Technical Studies Complete	Q3 2024	Complete
Interconnection Agreement Executed	Q3 2025	Complete
Discretionary Permits Secured	Q2 2027	Expected
Financing Secured	Q2 2026	Expected
EPC Contract Executed	Q2 2026	Expected
Construction Start	Q2 2027	Expected
Pile Installation	May – Nov 2027	Expected
Electrical Underground	May – Sep 2027	Expected
Tracker Installation	June – Dec 2027	Expected
Module Installation	July – Dec 2027	Expected
Delivery & Installation of Main Power Transformer	Q2 – Q3 2027	Expected
Energization for Interconnection	Q2 2028	Expected
Commissioning and Regulatory Testing	Q1 – Q2 2028	Expected
Commercial Operation Date	September 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 or around March 2021, when the Applicant purchased the Project. Interconnection studies for the Project began in 2020 and were completed in Q2 2023. Thereafter, the interconnection agreement was executed in Q4 2023 and amended on July 18, 2025 (refer to **Appendix I,**

Exhibit A-12). Wildlife and environmental surveys began in Q2 2023 and continued through Q3 2023. Cultural surveys occurred in Q1 2026 and are expected to continue through Q3 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 Q3 2026, with certification issued by the Commission occurring in approximately Q1 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. 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 Walker Road's Application.

Interconnection Agreement Executed

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

Discretionary Permits Secured

This refers to the expected time at which Applicant will receive a Renewable Energy Certificate from the Commission upon granting Walker Road'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:

Walker Road Solar 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	Michigan Department of Environment, Great Lakes, and Energy	Q4 2026	Q1 2027
Part 303, Wetlands Protection Permit	Michigan Department of Environment, Great Lakes, and Energy	Q4 2026	Q1 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	Michigan Department of Environment, Great Lakes, and Energy	Q4 2026	Q1 2027
Oversize/Overweight Vehicle Permit	Michigan Department of Transportation	Q4 2026	Q1 2027
Encroachment Permit		Q4 2026	Q1 2027
Public Act 116	Michigan Department of Agriculture and Rural Development	Q2 2026	Q3 2026
Drive Access Permit	Clinton County Road Commission	Q4 2026	Q1 2027
Driveway Permit		Q4 2026	Q1 2027

Subject	Responsible Agency	Anticipated Date of Application Submission	Anticipated Date of Permit/Approval Issuance
Right-of-Way Permit		Q4 2026	Q1 2027
Transportation Permit		Q4 2026	Q1 2027
Road Use Agreement		Q4 2026	Q1 2027
Drain Crossing Permit	Clinton County Drain Commission	Q1 2027	Q1 2027
Part 91, Soil Erosion and Sedimentation Control, of the Natural Resources and Environmental Protection Act, of 1994 Public Act 451, as amended, Soil Erosion Permit	Clinton County Drain Commission	Q1 2027	Q1 2027
Well and/or Sewage Disposal Construction Permit	Clinton County Health Department	Q1 2027	Q1 2027
Building Permit	Clinton County	Q1 2027	Q1 2027
Electrical Permit	Clinton County	Q1 2027	Q1 2027
Mechanical Permit	Clinton County	Q1 2027	Q1 2027
Plumbing Permit	Clinton County	Q1 2027	Q1 2027
Utility Crossing Agreement	Consumers Energy	Q3 2026	Q1 2027

V. LOCAL JOB CREATION AND PROJECT LABOR AGREEMENT

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

A. Both the construction and operation of the Project will benefit Clinton

A. County by creating jobs in the community. Strategic Economic Research (2023) prepared an IMPLAN-based economic impact analysis specific to the Project using Clinton County–level data. Their model estimates that construction of the Project would directly support 36 jobs in Clinton County. Additionally, the model estimates an additional 88 indirect and induced jobs would be supported at local businesses through construction purchases and spending and when workers supported by the Project spend their wages in the local community. During operation of the Project, an estimated 1 direct job would be created, and an additional 10 indirect and induced jobs would be supported through local operational spending and the local spending of workers supported by the Project.

Q. Will the Project utilize a Project Labor Agreement or Collective Bargaining Agreement?

A. Yes. The Applicant will require its EPC contractor to enter into a project labor agreement ("PLA"), collective bargaining agreement ("CBA"), or a similar agreement consistent with Michigan Compiled Laws 460.1221(u) as a condition of EPC contract execution. The Applicant has initiated discussions with the International Brotherhood of Electrical Workers and will finalize labor organization participation following EPC selection. Aaron Pangborn, Clinton County representative, provided a copy a letter of intent to utilize a PLA, CBA, or similar agreement, which is provided in **Appendix I, Exhibit A-8.4**. The Applicant will provide the executed agreement to the MPSC upon execution.

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 WALKER ROAD SOLAR FARM LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22130

DIRECT TESTIMONY

OF

JACK COMER

ON BEHALF OF

WALKER ROAD SOLAR FARM LLC

APPENDIX II – EXHIBIT 4

May 29, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Jack Comer, and my business address is 111 W Jackson Blvd STE 1320, Chicago, IL 60604.

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Walker Road Solar Farm LLC ("Walker Road" or "the Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Walker Road Solar Project (the "Project"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 150 MW of photovoltaic solar panels, to be located within Bingham Township in Clinton County, Michigan.

Q. Please summarize your educational background.

A. I hold a Bachelor of Science in Civil Engineering from the University of Wisconsin-Madison.

Q. Do you hold any licenses or professional certifications?

Q. I have successfully completed the Fundamentals of Engineering (FE) examination and am currently recognized as an Engineer-in-Training. I am working toward full licensure as a Professional Engineer, which requires four years of qualifying experience.

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

A. I am employed by Kimley-Horn and Associates, Inc. ("Kimley-Horn") as a Civil Analyst and Project Manager. In this role, I oversee a team of analysts and drafting professionals to ensure that our engineering design meets both client specifications and regulatory standards. Kimley-Horn was engaged as the environmental and civil engineering

consultant for the Applicant to provide permitting support and technical design services necessary to facilitate the development of the Project.

Q. Please summarize your professional experience.

A. I have four years of professional experience in civil engineering and project management. I regularly provide engineering services on large scale solar projects, including stormwater management, construction plan design, and quality assurance as a project consultant.

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

A. I have not previously provided testimony before the Commission or other government agencies.

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. I have reviewed and participated in the development of the Project Site Plan (**Exhibit A-1.1**), the Area Land Use (**Exhibit A-1.2**) and the Project's Stormwater Mitigation Plan (**Exhibit A-6.4**), where I am a listed author in addition to the Engineer of Record, Liam Sawyer, P.E.

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 **Exhibits A-1.1, A-1.2, and A-6.4** in **Appendix I**, including the related exhibits contained therein, such as the Project Site Plan, the Area Land Use Maps, and the Stormwater Mitigation Plan. 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. PROJECT OVERVIEW AND SITE PLAN

Q. Describe the current land use in the Project Area.

A. The Project is situated entirely within Bingham Township, Clinton County. Land use information for the Project is reflected in Exhibit A-1.2, which was prepared by SWCA with support provided by Kimley-Horn and adopted by the Applicant. I personally assisted in the development of the area land use maps, overseeing the drafting and technical review process to ensure the accurate representation of site conditions.

The current use of the property within the Project Area is principally agricultural land. A review of the National Land Cover Database identifies that specialty crops with the most acreage within the Project Area consist of dry beans and miscellaneous vegetables within the Project Area. Sheet A-1.23 of Exhibit A-1.2 illustrates the parcels within the Project Area that are participating in farmland development rights agreements under Michigan's Farmland and Open Space Preservation Program (PA 116).

The maps in Exhibit A-1.2 also show existing overhead and underground major facilities for electric, gas, and telecommunications transmission located within the Project Area. Exhibit A-1.2 reflects current local zoning districts for the Project Area. There are no designated coastal areas, inland waterways, groundwater management zones, flood-prone areas, or coastal erosion hazard areas within the Project Area or its 1,000-foot buffer. While the Project Area is bisected by the Fred Meijer Clinton-Ionia-Shiawassee Trail, the Project will not impact the trail. Further, within the Project Area, there are no known wild or scenic river corridors, parks, nature preserves, forest lands, or institutional and community uses.

Aside from the proposed Project, the Applicant is not aware of any known proposed land use plans for the properties within the Project Area.

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

A. I assisted in the development of the Site Plan (**Appendix I, Exhibit A-1.1**). The Site Plan relies on aerial photographs as the underlying map upon which Kimley Horn 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, 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").

The Site Plan establishes the functional framework for the Project's footprint, identifying 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, and operations and maintenance (O&M) area and the temporary laydown area.

In April 2023, August 2023, October 2023, and April 2024, comprehensive field investigations were conducted to identify wetlands, streams, floodplains and other water resources as well as to determine the likely regulatory status of the identified water resources. All such waterbodies are reflected on Sheets A-1.10 through A-1.17 of the Site Plan in **Appendix I, Exhibit A-1.1**. 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. 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 be approximately 16 feet above ground when the arrays are at full tilt, well below the statutory maximum of 25 feet.

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). All solar equipment and infrastructure are sited in full compliance with the required setback standards. Site planning incorporated aerial imagery and parcel boundaries. Refer to proposed setbacks and proposed conditions in the Site Plan in **Appendix I, Exhibit A-1.1**. These plan sheets show the dimensions from inverters to the project boundary, rights-of-way, and occupied structure on non-participating properties. Such setbacks are depicted on Sheets A-1.10 through A-1.17 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 the Fred Meijer Clinton-Ionia-Shiawassee Trail (which bisects the Project Area), there are no major institutions, parks, or recreational areas within 1,000 feet of the Project. Wetlands, streams, drains, and other aquatic features delineated during field reconnaissance are noted on Sheets A-1.10 through A-1.17 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 entirely within Bingham Township, Clinton County, Michigan. St. Johns city limits and Ovid Township are located within 1,000 feet of the Project Area as noted on Sheet A-1.10 of the Site Plan in **Appendix I, Exhibit A-1.1**.

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 blue boxes on Sheets A-1.10 through A-1.17 of the Site Plan of **Appendix I, Exhibit A-1.1**. Main housing structures identified by aerial imagery are assumed to be occupied, and a 300-foot setback was applied to same.

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

A. Participating properties are identified on A-1.12 through A-1.18 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 A-1.12 through A-1.18 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 LOD for the Project are illustrated on Sheets A-1.10 through A-1.17 in **Appendix I, Exhibit A-1.1**. The primary proposed temporary laydown area is located on parcel PID: 030-010-400-010-00 as noted on Sheet A-1.12 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 located on parcel 030-010-300-010-00 as identified Sheet A-1.12 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 A-1.10 through A-1.17 of the Site Plan in **Appendix I, Exhibit A-1.1**.

IV. PRELIMINARY STORMWATER MITIGATION

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 proposed 150-MW solar facility located in Clinton County, Michigan, including the installation of photovoltaic modules mounted on piles, gravel access drives, associated electrical equipment, underground utilities, and a substation on property that is predominantly agricultural land. The ground area within the fence perimeter that is not occupied by gravel roads or foundations will be seeded to a meadow-like condition to preserve the existing underlying soil and allow for revegetation and infiltration.

The Stormwater Mitigation 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 adverse hydrologic impact from excess runoff or contribution of eroded soil particles to receiving streams, drains, or waterways as a result of the Project. Kimley-Horn of Michigan, 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.

While discussions with the Clinton County Drain Commissioner ("CCDC") will necessarily continue prior to and during construction, the preliminary Stormwater Mitigation Plan summarizes CCDC 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 evaluated on a hydrological analysis of the site's soil groups, conservatively assuming type D soils for the site. Utilizing the site design, peak volume and flow analysis for 1-year and 100-year storm events have been modeled at multiple drainage areas, with preliminary basin sizing demonstrating that the proposed detention volumes conservatively exceed the CCDC's updated stormwater guidance. The Plan further concludes that the proposed facility will result in a net improvement in stormwater quality due to the transition of landcover from row crops to meadow-like seeding, which reduces the overall runoff potential and Total Suspended Solids.

The Plan concludes by describing the anticipated stormwater and erosion control permits, including the Applicant's intent to implement a Stormwater Pollution Prevention Plan ("SWPPP") in accordance with the requirements for a Notice of Coverage for NPDES Storm Water Discharges from EGLE and a Part 91 Soil Erosion and Sediment Control Permit from Clinton County. It further presents a summary of the required regulatory permits, such as the CCDC Drain Use Permit, to be completed both before and during

construction. The Applicant has committed to completing final construction-level drainage plans and obtaining all necessary permits prior to earthwork and land disturbance.

Q. Is the Stormwater Mitigation Plan Complete and Accurate?

A. 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.

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?

A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of WALKER ROAD SOLAR FARM LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22130

DIRECT TESTIMONY

OF

LIAM SAWYER

ON BEHALF OF

WALKER ROAD SOLAR FARM LLC

APPENDIX II – EXHIBIT 5

May 29, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Liam Sawyer, and my business address is 111 W Jackson Blvd STE 1320, Chicago, IL 60604.

Q. On whose behalf are you providing this testimony?

A. I am testifying on behalf of Walker Road Solar Farm LLC ("Walker Road" or "the Applicant") in connection with its application (the "Application") to the Michigan Public Service Commission ("MPSC" or "Commission") for the Walker Road Solar Project (the "Project"). The Project is a proposed alternating current solar photovoltaic generation facility that will include a nameplate capacity of up to 150 MW of photovoltaic solar panels, to be located within Bingham Township in Clinton County, Michigan.

Q. Please summarize your educational background.

A. I hold a Bachelor of Science in Civil Engineering from Marquette University, which I received in 2015.

Q. Do you hold any licenses or professional certifications?

Q. Yes. I am a licensed Professional Engineer (PE). I hold active PE licenses in Indiana (obtained in 2019), Illinois (obtained in 2019), and Michigan (obtained in 2023).

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

A. I have been associated with Kimley-Horn since 2012, and I have worked for the firm full-time since my graduation in 2015. I am currently a Shareholder, serving as a Senior Energy Practice Leader in our Chicago office.

Q. Please summarize your professional experience.

A. As a Senior Energy Practice Leader, I manage my own projects, help manage the broader energy practice, and advise engineering teams on design and plan updates. I oversee a team

of 20 professionals within our renewable energy group, including Jack Comer, who has also submitted testimony in this proceeding. I regularly serve as the Engineer of Record on projects, making final design decisions and coordinating with clients and municipal authorities. Throughout my career, I have worked on multiple utility-scale solar projects in the Midwest, including serving as the Engineer of Record for the 150-MW White Pine Solar project in Calhoun County, Michigan, and working on the Thorn Lake Solar project in Washtenaw County.

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

A. While I have not previously testified before the MPSC, I have provided testimony at a public hearings in Illinois, Indiana, and Michigan regarding solar developments.

II. PURPOSE AND SCOPE OF TESTIMONY

Q. Please describe your role with respect to the Project specifically.

A. I serve as the Senior Engineer and the Engineer of Record for the Project. In this capacity, I am responsible for the final engineering decisions and the overall quality assurance and quality control (QA/QC) of the civil engineering deliverables. I review and verify the technical design work performed by my team to ensure it meets structural, environmental, and regulatory standards.

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 **Exhibits A-1.1 (Planned Facilities/Site Plan), A-1.2 (Area Land Use Information), and A-6.4 (Stormwater Mitigation Plan)** in **Appendix I**. 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. PROJECT OVERVIEW AND SITE PLAN

Q. Describe the current land use in the Project Area.

A. Exhibit A-1.2 details Area Land Use Information and was developed through a collaborative process between SWCA and the Kimley-Horn engineering team. As the Engineer of Record, I directed the production of the technical maps that comprise this exhibit. My role involved a comprehensive review of the spatial data—including the integration of USGS topographic maps and high-resolution aerial photography—to ensure that existing land uses within 1,000 feet of the Project were accurately represented.

The Project Area is principally active agricultural land. Specifically, our review of the National Land Cover Database and field surveys identified specialty crops including dry beans and miscellaneous vegetables within the Project Area. Furthermore, the mapping identifies specific participating parcels enrolled in the PA 116 Farmland and Open Space Preservation Program.

The Area Land Use maps specifically delineate existing major facilities, including overhead and underground electric transmission corridors, natural gas pipelines, and telecommunications infrastructure. My team verified these locations against publicly available data and field observations to ensure the solar array layout and collection system avoid interference with existing utility rights-of-way.

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

A. As the Engineer of Record, I directed the development of the Site Plan (Appendix I, Exhibit A-1.1), which serves as the foundational engineering blueprint for the Project. We utilized high-resolution aerial photography as a base layer, integrating a multi-disciplinary data set

that includes American Land Title Association (ALTA) survey data, public geographic information system (GIS) records, and site-specific field investigations. This Site Plan is designed to provide the Commission with a comprehensive spatial analysis of the Project's footprint, delineating participating and non-participating parcel boundaries, existing infrastructure, and the proposed location of all primary facilities.

The Site Plan establishes the functional framework for the Project by identifying the location of solar arrays, internal access paths, the substation, and the operations and maintenance (O&M) area. It further defines the limits of disturbance (LOD) and specific clearing locations to ensure that construction activities remain within the permitted boundaries. From a technical oversight perspective, the Site Plan accounts for all known utilities and easements to ensure the structural and operational viability of the layout.

Q. Describe the Project's proposed setback locations from the Project boundary and infrastructure.

A. The engineering design strictly adheres to the setback requirements established by PA 233 and the Michigan Public Service Commission. Specifically, the layout incorporates 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. Furthermore, as a matter of sound civil design, we have implemented a minimum ~~100~~-25 foot setback for all Project equipment from the edge of any delineated wetland, shoreline, or county drain.

These setbacks were verified through a combination of aerial imagery and field-verified parcel data. Dimensioned maps demonstrating compliance with these standards

are included in Appendix I, Exhibit A-1.1. These sheets provide a granular view of the relationship between the proposed fencing and property lines, occupied structures, and protected environmental features.

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

A. The Project Area is bisected by the Fred Meijer Clinton-Ionia-Shiawassee Trail. The Site Plan focuses on ensuring the Project design respects this area through appropriate buffering and safety considerations, which are accounted for in the overall layout data. Beyond this trail, our analysis of the surrounding 1,000-foot buffer did not identify any major parks, nature preserves, or institutional uses. Waterbodies and delineated drainage features identified during our field surveys are noted in the comprehensive mapping provided in the Site Plan **Appendix I, Exhibit A-1.1**.

Q. Describe the jurisdictional boundaries and occupied structures located near the Project.

A. The Project is located within Bingham Township, Clinton County, and the City of St. Johns and Ovid Township are situated within 1,000 feet of the Project Area.

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

A. The Site Plan delineates the maximum limits of disturbance and specific areas designated for tree clearing. I reviewed these limits to ensure they encompass all necessary construction activity while protecting off-site resources. The primary temporary laydown area is strategically located on parcel 030-010-400-010-00. While the Site Plan maps focus on the permanent facility footprint, the narrative and the underlying engineering data

ensure that these temporary construction zones are accounted for within the Project's environmental and logistical planning.

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 located on parcel 030-010-300-010-00. **Appendix I, Exhibit A-1.1**. The design integrates this POI into the broader facility layout, ensuring efficient connection to the existing grid. Additionally, I directed the identification of all known electric transmission lines, communication lines, and drainage infrastructure within the Project Area. By mapping these features on the Site Plan, we ensure that the Project's construction and stormwater management strategies protect both public and private drainage systems.

Q. What is the maximum height of the proposed facilities and their relationship to existing utilities?

A. I have verified the structural specifications for the solar panel arrays, which are designed to reach a maximum height of approximately 16 feet at full tilt. This height was selected to ensure full compatibility with existing overhead electrical and communication transmission lines located within or adjacent to the Project Area. This design height is significantly below the 25-foot statutory maximum, ensuring that the Project remains well within the vertical limits for such facilities.

IV. PRELIMINARY STORMWATER MITIGATION

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

A. The Applicant engaged Kimley-Horn of Michigan to assist in generating the Stormwater Mitigation Plan (the "Plan"). The Project is a proposed 150-MW solar farm in Clinton County, Michigan, consisting of photovoltaic panels mounted on piles, gravel access drives, associated electrical equipment, and a substation within a fenced perimeter, with all non-road ground areas seeded to a meadow-like condition to preserve infiltration. Consistent with MPSC requirements, the Plan is provided for MPSC review and approval, to confirm the general stormwater mitigation methodology to be used at final design and to allocate space within the preliminary layout for best management practices.

The Plan applies a design approach that minimizes impervious cover to access roads and equipment pads, with panels elevated to allow vegetated infiltration beneath same, and provides BMPs—detention basins/berms, swales, and filter strips—to maximize on-site residence time and promote sedimentation and water quality. In coordination with the Clinton County Drain Commissioner ("CCDC"), drainage areas of five acres or more discharging to county drains will include BMPs—principally sediment basins/berms paired with filter strips—while areas not discharging to county drains may utilize filter strips or rock check dams provided post-construction discharge does not exceed pre-construction conditions. Sediment basins/berms are preliminarily sized to contain a post-construction 100-year storm, include at least 0.5-foot spillways that do not activate in the 1-year storm, provide a minimum 6-inch outlet, maintain maximum 3:1 side slopes and at least 0.25 feet of 100-year freeboard, and may outlet to county drains (preferably not at the drain invert), generally sited outside the Project fence where feasible.

In sum, the Plan is intended to demonstrate to the MPSC and CCDC that the Project's preliminary design employs accepted hydrologic methods and conservative

storage assumptions to maintain or reduce peak discharge rates, allocate space for BMPs at key discharge points, and protect county drains, with final design to be reviewed and approved by the CCDC.

Q. Please describe the methodologies, systems, and results of the stormwater assessment under the Plan.

A. Three representative drainage areas (Basin 12, 17, and 18) were modeled in HydroCAD 10.20-5c using SCS TR-20 methods for the 1-year and 100-year 24-hour storms (2.17 inches and 5.84 inches, respectively) to demonstrate compliance with CCDC general principles.

Results show that these drainage areas meet CCDC preliminary requirements discussed with the County on August 13, 2025 and September 3, 2025 (with peak stage, storage, and attenuation summarized for Basin 12, 17, and 18), and support an average storage need of approximately 2,700 cubic feet per drainage acre; a conservative 3,500 cubic feet per drainage acre was applied to preliminarily basins sitewide. Updated stormwater guidance issued October 13, 2025, indicates an average storage of approximately 900 cubic feet per drainage acre and the current preliminary basin sizing therefore exceeds updated guidance, indicating sufficient space for any additional BMPs required prior to construction.

The Plan's hydrologic assumptions conservatively treat on-site soils as Hydrologic Soil Group D, apply TR-55 curve numbers reflecting conversion from row crops to meadow seeding (with gravel roads remaining at higher CN), and conclude that the seeded condition substantially reduces composite CN and overall runoff potential relative to pre-construction agriculture. A comparison of existing versus proposed runoff prepared

using EGLE methodology shows no increase in runoff attributable to the change from crop land to the solar array.

The CCDC has indicated that its review will focus on confirming that all applicable runoff areas have reasonable stormwater management, that county drains are protected by appropriate BMPs, and that the Project is designed to maintain or reduce peak discharge to existing drains, consistent with the preliminary modeling summarized in **Appendix I, Exhibit A-6.4**. Design criteria references CCDC standards (including minimum 6-inch outlets and runoff coefficient guidance), the Subdivision Control Procedures pursuant to Act 288 of 1967 as applied to commercial development, and the updated CCDC computation methods and runoff coefficients. Final stormwater design (including first flush, bankfull, and outlet controls) remains subject to CCDC review and approval.

The Plan also identifies permitting pathways and commitments, including an NPDES Notice of Coverage under EGLE's Construction General Permit; a Part 91 SESC permit through Clinton County; any required drain use permits for stormwater outfalls and crossings, and ongoing coordination with the CCDC. Construction-phase controls will follow County-approved SESC measures and recommended phasing, and berm materials and compaction will meet geotechnical specifications with required inspections

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

A. As to minimization efforts, the project reduces runoff by converting cropland to meadow-like areas with seeding under elevated, pile-mounted panels, lowering the composite curve number and promoting infiltration. Areas not used for roads or foundations will be permanently vegetated, with limited grading to maintain existing tributary areas and reduce erosion and dust. Filter strips will work with sediment basins to protect county drains, while

disconnected gravel drives and preserved natural areas with buffers further limit runoff. MV lines will be consolidated, bored under streams and drains, and crossings will be minimized and combined to maintain flows and reduce disturbance.

As to mitigation measures, sediment and detention basins or berms will be used where runoff increases, sized to the 100-year storm with outlet controls, vegetated buffers, and CCDC-standard BMPs. Additional BMPs such as berms, detention basins, swales, filter strips, check dams, and rock filters will increase residence time, promote sedimentation, and dissipate velocities. Outlet conditions will achieve sheet flow with basins generally outside the project fence and outlet pipes tied to county drains per Clinton County preferences. Drain capacity and crossings will be protected by culvert sizing to CCDC and EGLE standards, HDD utilities at least four feet below drain bottoms, private tile relocation or replacement, and no net increase in runoff.

As to repair measures, permanent vegetation will be established across disturbed areas, supported by temporary SESC BMPs, reseeding, and maintenance during construction and operations to control runoff and erosion. Basin spillways are set to avoid activation in the one-year storm, and detention facilities are preliminarily oversized to add capacity and allow future BMPs if needed. Concentrated flow erosion will be addressed with check dams and rock filters while drains and culverts impacted by activities will be cleaned, cleared, repaired, or replaced. Final engineering will adjust basin sizing, grading, and outfalls to meet county requirements, with HDD frac-out response plans, private tile repairs or replacement, as-builts, and post-repair flow checks.

Q. Describe the pre-development drainage conditions related to the Project, and the methodologies and processes used to measure the same.

A. Before development, the site was predominantly agricultural land with straight row crops on hydrologic soil group D conditions across the modeled drainage areas. Soils were primarily clay loams with slow infiltration, which produced relatively higher runoff under cultivated conditions and limited vegetative resistance. Runoff modeling applied TR-55 assumptions for poor-condition row crops on group D soils using a curve number of 91 to represent the 100 percent pervious cover. Drainage followed natural surface contours as sheet flow toward established county drains, private drain tiles, and natural watercourses within multiple drainage districts. FEMA mapping indicated the area was predominantly Zone X of minimal flood hazard.

Q. Describe the post-development drainage conditions related to the Project.

A. Post-development drainage will be managed with detention basins, sediment basins, berms, swales, filter strips, and controlled outlet pipes sized to Clinton County standards. The site converts from row crops to permanent meadow beneath elevated solar arrays, which lowers the composite curve number, increases infiltration, and reduces runoff and erosion. Runoff from representative drainage areas is routed to basins that attenuate 1-year peak flows to low controlled discharges and store 100-year, 24-hour storm volumes with freeboard. Basin outlets use culverts and weirs with minimum spillways and slopes, discharging to county drains where coordinated with the Drain Commissioner, while access and utility crossings use permitted culverts and horizontal directional boring. Where areas do not drain to county drains, filter strips or rock check dams control discharges to at or below pre-construction rates, and private drain tiles are protected, relocated, or repaired to preserve existing drainage functions.

Q. Is the Stormwater Mitigation Plan Complete and Accurate?

A. 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.

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?

A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of WALKER ROAD SOLAR FARM LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.	))))))	Case No. U-22130

DIRECT TESTIMONY

OF

RYAN RUPPRECHT

ON BEHALF OF

WALKER ROAD SOLAR FARM LLC

APPENDIX II – EXHIBIT 6

May 29, 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 Walker Road Solar Farm LLC ("Walker Road" or "the Applicant") in connection with its application to the Michigan Public Service Commission ("MPSC" or "Commission") for the Walker Road Solar Project (the "Project"). Walker Road 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 150 MW of photovoltaic solar panels, to be located within Bingham Township in Clinton County, Michigan.

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

A. Since January 2022, I have been employed by SWCA Environmental Consultants, Inc. ("SWCA"), 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 Limited ("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 Clinton 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 $1,538,138.01. 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.