Appendix T

Abandonment, Decommissioning, and Reclamation Plan

Mountain Peak Energy Storage
Conditional Use Permit Application
September 2025

Abandonment, Decommissioning, and Reclamation Plan
Mountain Peak Energy Storage Project
Saline County, Kansas

Stantec

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Table of Contents

LIST OF TABLES

LIST OF FIGURES

1.0 INTRODUCTION

Mountain Peak Energy Storage LLC (Mountain Peak) is proposing to construct the Mountain Peak Energy Storage Project (the Project) located southeast of the City of Salina, in Saline County, Kansas. The Project encompasses approximately 16.8 acres within the proposed perimeter fencing. The rated power capacity of the Project will be 350 megawatts (MW) alternating current [AC], with a 1,400-MW-Hour (MWh) energy storage capacity. Major components of the Project include battery energy storage systems, inverter/transformer power conversion systems and associated structures and foundations.

Construction of the Project is anticipated to start in mid-2028, with a projected Commercial Operation Date in late 2029. This Abandonment, Decommissioning, and Reclamation Plan (Plan) provides a description of the decommissioning and site restoration phase of the Project. The decommissioning phase is assumed to include the removal of Project facilities as listed in Section 1.1 and shown in Figure 1.

This Plan provides an overview of the primary decommissioning activities, including the dismantling and removal of facilities, and subsequent restoration of land. A summary of estimated costs associated with decommissioning the Project is provided in Section 4.0. Summary statistics and estimated costs are provided assuming a 350-$MW_{(AC)}$, 1,400-MWh Project design.

1.1 BATTERY STORAGE FACILITY COMPONENTS

The main components of the Project include:

- Battery energy storage system (BESS) with integrated inverters
- Transformer stations
- Steel pile foundations for equipment
- Electrical cabling and conduits
- Perimeter fencing
- Tornado shelter
- Water storage tanks and foundations
- Gravel yard and access drive
- Substation and transmission tie-in line
- Permanent stormwater drainage basin

1.2 TRIGGERING EVENTS AND EXPECTED LIFETIME OF PROJECT

Project decommissioning will start after the abandonment or cessation of the use and may be triggered by an event such as the end of a contract or power purchase agreement. As per Saline County Draft Regulations (Draft County Regulations), Subsection 12.17 – Battery Energy Storage Systems, the Project will be decommissioned within six months of the end of the service life of the facility. If properly maintained, the expected lifetime of a utility-scale BESS project is 25 years or greater with an opportunity for additional years of operation with necessary equipment replacement or augmentation.

When decommissioned, the battery units will be shipped to a recycling facility, as described further in Section 2.2. Other components of the BESS facility with resale value may be sold in the wholesale market. Components with no wholesale value will be salvaged and sold as scrap for recycling or disposed of at an approved off site licensed solid waste disposal facility (landfill). Decommissioning activities will include removal of the BESS and associated components as described in Section 2 and the restoration of the land into a usable condition that is similar to the pre-development condition.

1.3 DECOMMISSIONING SEQUENCE

Project decommissioning activities will be completed within six months of the Project becoming non-operational. Mountain Peak or the facility owner at the time of decommissioning will be the responsible party for Project decommissioning. The anticipated sequence of decommissioning and removal is described below; however, overlap of activities is expected and may be adjusted by the chosen decommissioning contractor.

- Reinforce access and internal areas, if needed, and prepare site for component removal
- Install temporary fencing and erosion control best management practices (BMPs) to protect sensitive resources, if present, and control erosion during decommissioning activities
- De-energize BESS and associated electrical equipment
- Remove integrated battery storage units
- Remove BESS steel pile foundations
- Remove transformers and steel pile foundations
- Remove electrical cables and conduits (less than 36-inches below ground surface)
- Remove the tornado shelter
- Remove the water storage tanks and concrete slab foundations
- Remove substation, if decommissioned
- Remove transmission tie-in line, if decommissioned
- Remove aggregate (if not retained for future use), import topsoil (if necessary), and grade site
- Restore site to allow for pre-project land use

2.0 PROJECT COMPONENTS AND DECOMMISSIONING ACTIVITIES

The BESS facility components and decommissioning activities necessary to restore the Project area, as near as practicable, to pre-construction conditions are described within this section. The above and below-ground facilities will be removed and re-used, recycled, or disposed of in accordance with state and federal law at a licensed solid waste facility.

2.1 OVERVIEW OF BATTERY ENERGY STORAGE FACILITY SYSTEM

Mountain Peak anticipates utilizing approximately 392 self-contained battery storage units with a total energy storage capacity of approximately 1,400 MWh. The Project area encompasses approximately 16.8 acres within the proposed perimeter fencing. Prior to construction, land use within the BESS area is predominantly agricultural with a small area used for concrete disposal. Statistics and estimates provided in this Plan are based on the Megapack battery storage units manufactured by Tesla, Inc. for the purposes of estimation. The manufacturer and model of the battery storage units, as well as the specific quantity and electrical ratings are subject to change.

Low and medium voltage collection cabling will be installed below the surface at an approximate depth of 36 to 48 inches (three to four feet). Foundations, electric cabling, and conduit above and below the soil surface will be removed to a depth of 36 inches, unless an agreement to allow improvements to remain has been reached with the landowner and approved by the County. Project components within the transmission tie-in line easement area will be decommissioned in accordance with the terms of the easement agreement. At a minimum, the components will be decommissioned as required by the Draft County Regulations. Public roads damaged or modified during the removal and reclamation process will be repaired and restored upon completion of the decommissioning phase in accordance with a future agreement with the County.

Estimated quantities of materials to be removed and salvaged or disposed of are included in this section. Some of the materials described will have salvage value; although there are also some components that will likely have none at the time of decommissioning. All removed materials will be salvaged or recycled to the extent possible. All other waste materials will be disposed of in accordance with state and federal law at a licensed solid waste facility. If decommissioned prior to the end of their useful life, the battery packs may have value in a resale market, depending on their condition.

Table 1 presents a summary of the primary components of the Project included in this Plan.

Table 1 Primary Components of BESS Facility

Component	Quantity	Unit of Measure
Battery Energy Storage Units with Integrated Inverters	392	Each
Transformers	98	Each
Steel piles/piers (BESS units)	3,136	Each
Electrical Cables and Conduits	12,800	Lineal Foot (estimated)
Gravel yard (aggregate base-fill within fence line)	16.83	Acres
Access Roads	1,000	Lineal Foot (estimated)
Perimeter Fencing	3,964	Lineal Foot (estimated)
Tornado shelter	1	Each
Water storage tanks and foundations	2	Each
Substation	1	Each
Overhead Transmission Tie-in Line	1,850	Lineal Foot (estimated)
Permanent Stormwater Management Area (approximate)	1.4	Acres

2.2 BESS UNITS AND SUPPORT STRUCTURES

The Project includes 392 battery energy storage units, each with integrated ventilation. The system will provide 350 $MW_{[AC]}$ of rated power capacity and 1,400 MWh of energy storage capacity. Statistics and estimates provided in this Plan are based on the Tesla Megapack battery energy storage units. This Plan assumes that each battery unit will be supported by eight piers. The units are mainly comprised of materials such as lithium-ion (Li-ion) batteries, steel, copper, plastic, and epoxies. If decommissioned prior to the end of their useful life, the battery packs will likely have value in a resale market, depending on their condition.

At the time of decommissioning, the BESS will be completely removed from the Project site. The structural elements, means of egress, and required fire detection suppression systems, will be protected during decommissioning and confirmed as being acceptable after the system is removed. The manufacturer and model of the battery storage units, as well as the specific quantity and electrical ratings are subject to change. Tesla is an example of a manufacturer that offers a program accepting responsibility for the recycling of their battery system at end of life. Although not all manufacturers offer this type of return program, it is assumed, based on manufacturer information and projected market conditions, that the battery units will have resale value for the first 10 to 15 years. Therefore, no battery recycling costs have been included in this cost estimate.

The BESS pile foundations will be removed and recycled or properly disposed of in accordance with state and federal law at a licensed solid waste facility. Above ground facilities and subsurface materials will be removed and salvaged or disposed of in accordance with state and federal law at a licensed solid waste facility.

2.3 TRANSFORMER STATIONS AND ELECTRICAL CABLING

Ninety-eight (98) medium voltage transformers (MVTs) will be located adjacent to the BESS container units on concrete pads. The transformers and associated equipment will be deactivated, disassembled, and removed at decommissioning. Depending on condition, the transformers may be sold for refurbishment and re-use. If not re-used, they will be salvaged or disposed of at an approved solid waste management facility. All oils and lubricants will be collected and disposed of at a licensed facility.

The Project's underground electrical collection system will be placed at a depth of 36 to 48 inches. The Plan assumes that electrical cabling located 36 inches or more below the ground surface will be abandoned in place.

2.4 BESS YARD, PERIMETER FENCING, AND ACCESS ROADS

The BESS site is surrounded by an approximately 3,964-foot-long chain-link fence. The area within the fence contains an aggregate surface approximately six inches in depth. An external access drive will provide direct access to the BESS from a public road. Internal gravel access roads within the facility fence line will provide access to the internal equipment. Access roads will be comprised of a 9-inch-thick gravel layer placed on geogrid materials and compacted native soil subgrade.

Aggregate and underlying geogrid material will be removed during the decommissioning process. Geogrid material that is easily separated from the aggregate during excavation will be disposed of in an approved solid waste disposal facility. Geogrid material that remains with the aggregate will be sorted out at the processing site and properly disposed of. Following removal of aggregate and geogrid material, and fencing, the yard and access road areas will be graded, de-compacted, backfilled with native subsoil and topsoil, as needed, and land restored to a condition suitable for the preconstruction land use. The soil shall be tested following decommissioning, in conformance with local regulations.

2.5 PERMANENT STORMWATER BASINS

The current design includes one permanent stormwater detention basin within the footprint of the BESS facility that will remain in place for the life of the Project. The detention basin is approximately 1.4 acres in size and although it may be retained at the end of the Project operational period, this report has conservatively assumed it will be removed. The basin will be filled with clean fill, finished with topsoil, and graded to restore as near as practical to pre-construction drainage patterns.

2.6 TORNADO SHELTER AND WATER STORAGE TANKS

Per Saline County, a tornado shelter will be required for the BESS project. The placement of the tornado shelter on the site will be in conformance with all local and state building codes. The tornado shelter will have resale value at the end of Project life and may be sold or ownership transferred at that time. To be conservative, decommissioning costs associated with the tornado shelter were included in this Plan.

Per the local fire department, water storage tanks will be required for the BESS project and will be removed during decommissioning. Two water storage tanks will each have a capacity up to 24,000 gallons. The steel

water storage tanks will be disassembled and removed from the site. The steel from the tanks and the concrete pads will be removed and recycled or properly disposed of in accordance with state and federal law at a licensed solid waste facility.

2.7 PROJECT SUBSTATION AND ABOVE GROUND TRANSMISSION TIE-IN LINE

The Mountain Peak site will include a Project substation and an overhead transmission tie-in line. The substation will be located within an approximately 180 feet by 180 feet gravel yard. The substation will include a gravel pad, two power transformers and footings, electrical control house and concrete foundations, as needed. The Project will utilize an approximately 1850-foot-long above ground transmission line and four steel monopoles to interconnect to a larger regional substation.

The substation transformers may be sold for re-use or salvage. Components of the substation that cannot be salvaged will be transported off-site for disposal at an approved waste management facility. Foundations and footings will be demolished and removed. The transmission tie-in line and associated structures will be removed. The transmission tie-in line, associate structures and other Project components within the transmission tie-in line easement area will be decommissioned in accordance with the terms of the easement agreement. At a minimum, the components will be decommissioned as required by the Draft County Regulations. Although the substation and transmission line may be retained at the end of the Project life, an estimated decommissioning cost has been included in this Plan.

3.0 LAND USE AND ENVIRONMENT

3.1 SOILS AND PREVIOUS LAND USE

The proposed BESS facility is located on agricultural land. Land disturbed by Project facilities will be restored in such a way as to allow a land use similar to its original use as it existed prior to Project construction.

3.2 RESTORATION AND REVEGETATION

Project areas that have been excavated and backfilled will be graded as previously described to restore land to a condition allowing a land use similar to the pre-construction use. Restoration will be completed as required by landowner and regulatory commitments. Soils outside the aggregate pad that were compacted during de-commissioning activities will be de-compacted, as necessary, to restore the land to a condition suitable for the preconstruction land use. If required, topsoil will be placed on disturbed areas, as needed, and seeded with appropriate vegetation or in coordination with current landowner(s).

3.3 SURFACE WATER DRAINAGE AND CONTROL

Surface water conditions at the Project site will be reassessed prior to the decommissioning phase. Mountain Peak will obtain the required water quality permits, if needed, before decommissioning of the Project. Construction stormwater permits will also be obtained, and an Erosion Control and Stormwater Management Plan will be prepared describing the protection needed to reflect conditions present at that time. BMPs may include construction entrances, temporary seeding, permanent seeding, mulching (in non-agricultural areas), erosion control matting, silt fence, filter berms, and filter socks.

3.4 MAJOR EQUIPMENT REQUIRED FOR DECOMMISSIONING

The activities involved in decommissioning the Project include removal of the above and belowground Project equipment and restoration as described in Sections 2 and 3.2.

Equipment required for the decommissioning activities is similar to what is needed to construct the BESS facility and may include, but is not limited to: small cranes, low ground pressure (LGP) track-mounted excavators, backhoes, LGP tracked bulldozers and dump trucks, front-end loaders, water trucks, disc plows and/or tractors to restore subgrade conditions, and ancillary equipment. Standard dump trucks may be used to transport material removed from the site to disposal facilities and to import clean fill and topsoil if necessary.

4.0 DECOMMISSIONING COST ESTIMATE SUMMARY

Expenses associated with decommissioning the Project will be dependent on labor costs at the time of decommissioning. For the purposes of this report, approximate 2024 average market values were used to estimate labor expenses. Fluctuation and inflation of labor costs were not factored into the estimate table.

4.1 DECOMMISSIONING EXPENSES

Project decommissioning will incur costs associated with removal of facilities and disposal of components not recycled or sold for salvage, including materials which will be disposed of at a licensed facility, as required. Decommissioning costs also include backfilling, grading and restoration of the proposed Project site as described in Sections 2 and 3. Table 2 summarizes the estimated costs for activities associated with decommissioning the Project.

Table 2 Estimated Decommissioning Expenses

Activity	Unit	Quantity	Cost per Unit	Total
Overhead and management	Lump Sum	1	$319,000	$319,000
Battery pack and container removal	Each	392	$4,720	$1,850,240
Battery pack pile removal	Each	3,136	$54	$169,344
Transformer and concrete pad foundation removal	Each	98	$1,075	$105,350
Perimeter fence removal	Lineal Foot	3,964	$4.60	$18,234
Stormwater basin removal	Lump Sum	1	$92,966	$92,966
Tornado shelter	Each	1	$9,000	$9,000
Water storage tanks and foundation removal (Up to 24,000-gallon capacity)	Each	2	$7,500	$15,000
Substation	Lump Sum	1	$450,000	$450,000
Overhead generation tie-in transmission line	Linear Mile	0.35	$275,000	$96,250
Access road and internal yard removal	Lump Sum	1	$63,600	$63,600
Soil sampling	Lump Sum	1	$20,000	$20,000
Site restoration (topsoil, grading, and revegetation, as needed)	Lump Sum	1	$302,600	$302,600
Total Estimated Cost for Removal of BESS Facilities and Site Restoration				$3,511,584

4.2 DECOMMISSIONING REVENUES

Battery energy storage systems will retain a significant resale value during the early phases of their life cycle. During the first 10 years of the Project, BESS units, or the individual battery cells, could be sold for re-use or returned to the manufacturer for recycling. It is estimated that the battery units' value during the first ten years of the Project life would offset (or exceed) the cost of preparation and shipping. Although additional revenue due to resale may be generated during this stage of the Project, these revenues are not reflected in Table 2. During later stages of the Project, the value of the battery components, such as lithium, copper, aluminum, and steel, would be extracted during recycling to provide an offset to the disposal costs. Tesla, a possible BESS manufacturer for the Project, currently provides a recycling program at end of life as described in Section 2.2.

Mountain Peak is committed to re-assessing the decommissioning costs every five years beginning on the fifth anniversary of Project commissioning, and annually for the final five years of the Project life. Additionally, due to the recycling program currently offered by Tesla, no cost for recycling or disposal of the BESS is included at this time.

4.3 DECOMMISSIONING COST SUMMARY

Table 3 provides a summary of the estimated cost to decommission the Project, using the information detailed in Section 4.1. Estimates are based on 2024 prices, with no resale or salvage revenue, market fluctuations or inflation considered.

Table 3 Decommissioning Cost Summary

Description	Cost
Decommissioning Expenses for Facility Removal and Restoration	$3,511,584

4.4 FINANCIAL MECHANISM/ASSURANCE

As per County Regulations, Mountain Peak Energy Storage LLC will provide the County Clerk with a decommissioning bond or financial security prior to commencement of the Project equal to the amount estimated in this Plan. The bond or financial security will be adjusted for inflation annually and will be reevaluated on the fifth anniversary of the commercial operation date of the Project

Figure 1 Proposed Project Layout