



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 5: BYG Comments on Applicant`s Response to Examining Authority`s ExQ2.1.17 on Decommissioning.

In Q2.1.17 the Applicant was asked to *Provide evidence that at the end of the project life the asset value will be greater than, if not at least equal to the cost of decommissioning`.*

1. The Applicant's response to this important question stretches credulity. It merely consists of a random juxtaposition of seemingly disconnected numbers. A *`longer lifeline of 40 years`* has, without explanation, been assumed as 44 years; 12.6% drops in from nowhere; likewise an unexplained *`108million GBP panel CAPEX`*. This sterling capex in turn produces, again without explanation, a US dollar amount of \$0.02 which is then compared with the *Nerdwallet* site's \$0.05 estimated cost of panels for those currently in the US who want to place used panels on their roofs!
2. The answer provided to the ExA is ill-considered at best. It fails to answer the question. More worrying is that it also shows that the Applicant has not included any analysis of this nature in their project planning. This can only mean that the Applicant believes it is not of their concern.
3. This is a direct reminder of the muddle left behind when the Applicant sold Ukujima, their most significant project to date as detailed in our previous submission **RR-0092** para **3.5.1**. This will not confer confidence to the potential *`third party investors`* that the Applicant is now relying on for funding construction and decommissioning.
4. Even more important is that any analysis based simply on current facts, even if carried out correctly, is meaningless. It is inconceivable that there would be any serious market for two million panels that have a remaining useful life of just six years, even if already de-installed. Furthermore, in 40 years' time solar panels will have evolved considerably and those in this project would be obsolete. A great deal of research is already underway to produce panels with perovskite solar cells which, it is claimed, will be much more efficient. Undoubtedly other developments will also take place.

5. BYG believes that the estimated cost of decommissioning should be realistic, and no allowance should be made for the sale of the installed panels. There should rather be an allowance for the cost of their removal and disposal.

6. We continue to believe that the only way of securing certainty that the BWSF site will be restored to its current state as claimed by the Applicant is via a bond or sinking fund to ensure that the appropriate decommissioning funding is in place.

7. Based on the answer that the Applicant has given to the ExA's question which is discussed here, it is also apparent that an independent assessment of the expected costs of decommissioning would be required to ensure that such a bond would provide satisfactory funding.

8. The reality is that the ExA has been given none of the evidence it seeks that the Applicant can securely fund the decommissioning of BWSF, which they now improbably claim will be achieved by selling obsolete, second-hand panels that are close to the expiry of their useful life.
