



Kyle Unruh - I am here on behalf of Renewable Northwest, a non-profit representing over 80 members, including power marketers, purchasers, environmental NGOs, and most clean energy developers who operate in the Pacific Northwest. Thank you for providing the opportunity to comment on SB 160.

Montana's decommissioning bond requirements already require 100% of the estimated decommissioning costs are secured by a bond paid mid-way through the useful life of a project, thereby protecting the state and its citizens from all appropriate decommissioning costs consistent with best practice in other states. A 125% bond paid in advance of construction is not necessary, particularly with industry standard 5-year reviews, and would drive up project costs in Montana relative to other states. As an example, one of our members is developing a large solar+storage project in Montana and has calculated compliance with SB 160 would increase letter-of-credit fees to their banks by \$600,000.

Requiring annual review of decommissioning requirements per project is not industry standard and does not add value for the state or its citizens. 5-year reviews are sufficient to ensure decommissioning requirements are robust and up-to-date.

This bill does not adequately account for the ability of the salvage value of assets to offset the value required for a decommissioning bond. The salvage value should be assessed and applied to the decommissioning bond value each time the bond is reviewed.

Under Section 2(2)c: removing all cement, foundations, buildings, and ancillary equipment is also not industry standard and not necessary to add to existing requirements.

Section 3(2)a: allowing the department to modify an already compliant plan outside of a 5-year review cycle is not necessary and opens an already functional, robust process to additional uncertainty.

Thank you for your consideration.