# Wisconsin Department of Natural Resources Engineering Plan

Akron Solar, LLC Adams and Wood County, Wisconsin December 20, 2024

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## 1. Introduction

Akron Solar, LLC¹ (Akron Solar), an independent power producer, is proposing a 200-megawatt (MW) alternating-current (AC) photovoltaic (PV) solar project, the project collector substation (Collector Substation), generation transmission line (gen-tie), a switchyard, a 200MWAC Battery Energy Storage System (BESS) (the Project). The Project will be located on approximately 2,409 acres in the Towns of Rome in Adams and Wood County, Wisconsin. Only a roughly 500-foot section of the proposed gen-tie and the proposed switchyard is located in Wood County, Wisconsin. The proposed gen-tie is approximately 1.7 miles long and will require a separate CPCN application. The majority of the Project Boundary is currently planted in red pine trees for timber harvest. The majority of the Project Boundary will be cleared of timber by the current landowner prior to the start of construction of the solar generation and gen-tie.

The point of interconnection (POI) for the Project will be a line tap from the Collector Substation to an existing 138 kilovolt (kV) transmission line owned by American Transmission Company (ATC). The Project will deliver 200 MWs at the POI. The switchyard will be owned and operated by ATC once constructed.

Consistent with Wisconsin Administrative Code section PSC 111.51(2), Akron Solar has notified and consulted with staff of the Wisconsin Department of Natural Resources (WDNR) and the Public Service Commission of Wisconsin (PSCW) of its intent to file for a Certificate of Public Convenience and Necessity (CPCN) for the Project. Akron Solar has also consulted with the staff of these agencies on the scope of the proposed project, the alternatives that must be considered in the application, and additional information that the PSCW requires as part of the CPCN application. Akron Solar will be submitting a CPCN application for the solar generation and gen-tie, consistent with the opportunity provided for by Wis. Stat. § 196.491(3)(a)1.

In accordance with Wis. Stat. § 196.491(3)(a)3a, Akron Solar submits this Engineering Plan (Plan). Through this filing, Akron Solar is providing the Plan to the WDNR at least 60 days before Akron Solar will file the corresponding CPCN application with the PSCW. Akron Solar requests that within 30 days after receipt of this Plan, WDNR provide a listing of all permits or approvals, that, based on the information contained in this Plan, appear to be required to construct the Project. In accordance with Wis. Stat. § 30.025(1s), Akron Solar will promptly apply for all applicable federal and state permits and approvals identified.

All distances, widths, and descriptions below are estimates and are subject to change based upon final facility siting and layout, electrical infrastructure routing, and access road availability.

<sup>&</sup>lt;sup>1</sup> Akron Solar is a wholly-owned indirect subsidiary of NextEra Energy Resources, LLC (NEER). NEER, through its affiliated entities, is the world's largest generator of renewable energy from the wind and the sun.

## 1.1. **Project Overview**

The Project will be located on approximately 2,409 acres (which includes both primary and alternate array locations) in the Town of Rome in Adams and Wood County, Wisconsin. The majority of the land required for the Project will be leased from participating landowners. A small portion of the land required for the Collector Substation will be acquired via a purchase option with ownership by Akron Solar. At the end of life of the Project, the leased land will be returned to the landowner. The Project is still actively marketing offtake options including power-purchase agreements and development-transfer arrangements.

The Project will include the following key elements:

- 1. Solar array blocks consisting of PV modules mounted on a single-axis, horizontal tracker mounting system supported by steel posts;
- 2. Planned mono-crystalline or similar solar modules totaling approximately 270 MW Direct Current (DC) for the primary array and 68 MW<sub>DC</sub> for the alternate array;
- 3. AC coupled BESS;
- 4. Electrical collector circuit system infrastructure consisting of AC and DC cabling;
- 5. Power Conversion Units (PCUs);
- 6. Collector Substation located within the Project Boundary on approximately five acres with two main step-up transformer, control enclosure, circuit breakers, disconnect switches, relay panels, surge arrestors, grounding system, metering, and communications equipment;
- 7. Approximately 10-foot-wide gravel access roads that connect the Project to existing public roads and provide access to project equipment. Also, approximately 20 foot-wide gravel access roads to access the Collector Substation and BESS yard;
- 8. An approximately 1.7 mile 138 kV transmission line connecting the Collector Substation to the POI. The POI is a switchyard that will be owned and operated by ATC once constructed;
- 9. Project Operation and Maintenance (O&M) Building; and
- 10. Temporary construction areas, including a general construction laydown yard, public road improvements, and staging areas as needed.
- 11. Point of Interconnection switchyard which is to be constructed simultaneously with the project and will be owned and operated by ATC. This switchyard is necessary and integral to the construction and operation of the project. Design of the switchyard has not yet been determined.

## 1.2. Exhibits

In order to provide pertinent information about the Project, Akron Solar is including with this submission maps that identify the following features:

- Project Boundary
- Project topography
- Water resources: lakes, rivers, streams, wetlands

- Land cover types
- Existing facilities

# 2. Description of the Proposed Project

## 2.1. General Facility Description

The Project is a 200-MW<sub>AC</sub> utility scale solar facility, a Collector Substation, associated gen-tie, switchyard, and a 200 MW<sub>AC</sub> BESS facility. The major components of the Project include the PV panels, tracking system, PCUs, collection system, Collector Substation, and gen-tie. The PV panels will convert sunlight to electric current as the tracking system follows the sun from east to west during the day. The electric current is converted from DC to AC by the PCUs. The PCUs also increase the voltage to a medium voltage level to efficiently move the energy to the Collector Substation. Storage of electricity will occur via a 200MW<sub>AC</sub> AC-coupled BESS, which is linked to battery-specific PCUs able to charge the batteries from both excess solar production and from the grid. The Collector Substation will further increase the voltage to the interconnection voltage of 138 kV. Finally, the gen-tie will carry the electricity to the POI.

#### 2.1.1. Modules and Tracking System

The market for PV panels is dynamic and evolving so the PV panel supplier and technology to be used is not known at this time. Closer to the start of detailed design, the Project will conduct a competitive solicitation to procure the equipment that provides the best technical and financial solution. The current preliminary designs include 200  $MW_{AC}$  of PV panels installed. This would require approximately 450,000 to 480,000 high efficiency PV panels, depending on the wattage rating selected (primary Modules only).

The PV panels will be attached to a single-axis tracking system that tracks the sun during the day. The tracking system will be mounted to steel piles driven into the ground. The tracking system keeps the panels more directly oriented to the sun, which improves the amount of electricity that can be generated throughout the day.

#### 2.1.2. PCU and Collection System

The DC electricity from the PV panels is routed to the PCUs using DC collection wiring. This wiring runs underneath each row of PV panels and then comes together at the DC combiner boxes. The DC cabling is then typically routed underground to eventually connect to the PCU.

The PCUs will be approximately 4,100 kW each in capacity and the Project will require approximately 56 PCUs to meet the nameplate capacity (primary inverters only). The PCUs will be located throughout the PV array area. Each PCU will be mounted on steel piles or a concrete foundation and will include an inverter, medium voltage transformer, and

controls/communication equipment. The quantity of PCUs will depend on the size of the final module selected.

The AC electricity cabling from the PCUs will be routed to the Collector Substation primarily in underground trenches from 30 to 48 inches deep with some use of an aboveground system. The AC collection system is expected to be 34.5 kV. Underground boring will also be utilized with the depths varying at each location.

#### 2.1.3. Collector Substation and Transmission Interconnection

The Collector Substation will have a footprint of up to 3 acres, located approximately 1.7 miles south of the switchyard which will be built simultaneously with the project for ATC to own and operate. The AC collection system will enter the Collector Substation where the voltage will be increased to the interconnection voltage of 138 kV. Substation equipment will include a main step-up transformer, control enclosure, circuit breakers, disconnect switches, relay panels, surge arrestors, grounding system, metering, and communications equipment. The main step-up transformer will be mounted on a concrete foundation with a containment pit.

The preferred gen-tie route is expected to be approximately 1.7 miles (8,976 ft.) long and will connect the Collector Substation to the switchyard which will be built simultaneously with the project to be owned and operated by ATC. The gen-tie will be a single-circuit 138-kV transmission line most likely located on monopole structures with guy wires. The number and height of each structure will be determined during the detailed design phase of the Project. The preferred gentie route was chosen to minimize impacts to landowners, existing utilities and natural resources present along the corridor.

An alternate gen-tie route has also been identified and is approximately 1.9 miles in length.

#### 2.1.4 Site Security and Fencing

Each PV array area will be fenced to provide security for plant equipment and public safety. Each fenced area will have gated access at the road entrances. The perimeter fence for the PV array will use wildlife friendly fencing. The Collector Substation and BESS yard will follow different fencing and access requirements that comply with applicable codes and meet applicable National Electric Code and North American Electric Reliability Corporation Critical Infrastructure Protection requirements.

#### 2.1.5 Project Access Roads

Gravel roads will be constructed throughout the site to provide access to public roads and solar equipment. Roads within the Project will be used for construction and O&M activities. These roads will be approximately 10 feet wide and will be constructed at grade to maintain existing stormwater flow patterns on the surface. Roads to the Collector Substation and BESS will be approximately 20 feet wide.

#### 2.1.6 Stormwater Drainage and Erosion Control

Akron Solar will apply for coverage under the WDNR Construction Site General Permit for stormwater discharges from construction activities and will prepare a conceptual Stormwater Pollution Prevention Plan (SWPPP) for inclusion in the CPCN application. A final SWPPP will be developed once the PSCW final order is issued, and final design has been completed. The current topography of the Project Boundary is relatively flat. Minimal grading is anticipated to be required. Current sheet flow drainage patterns will generally be maintained in the final facility configuration.

### 2.1.7 Waste and Hazardous Materials Management

The primary waste generated during construction will be cardboard and wooden pallets. Waste will be disposed of at approved disposal or recycling facilities. The use of hazardous materials will be limited. Expected hazardous chemicals to be used during Project construction include diesel fuel, gasoline, oil, grease, spray paint, and galvanization paint.

### 2.1.8 Meteorological Stations

As part of the plant monitoring system, a number of meteorological stations will be installed across the Project Boundary. The stations are expected to consist of a monopole structure approximately 8 feet tall, topped with a cross-arm on which instruments will be mounted to measure wind speed/direction, pressure, precipitation, temperature, and irradiance. Additional instrumentation will include several soiling stations, which are used to measure dust / particulate accumulation on modules, and reference cells. All instrumentation will be connected to the main underground fiber network leading to the Collector Substation.

#### 2.1.8 Operation and Maintenance Building

Will be used for the storage all equipment needed to operate and maintain the solar site. This will consist of replacement parts and Tools as well as landscaping equipment to manage vegetation. This Building will also double as a working space with a kitchen and bathroom for onsite staff.

#### 2.1.9 Laydown Yard

Temporary location for the solar contractor to store equipment and material while constructing the solar site. This location will also be parking for onsite workers as well as the location for all temporary construction trailers for the onsite staff.

# 3 Construction of the Proposed Project

#### 3.1 Overview

Construction of the Project is anticipated to begin as early as Q4 2026 and to be completed by Q4 2029. The primary construction activities will consist of site mobilization, site preparation and grading, and installation of steel piles, tracker system, PV panels, PCUs, and AC and DC collection. The Collector Substation and gen-tie will be constructed in parallel with the PV array.

## 3.2 Temporary Construction Workspace, Laydown, and Mobilization Areas

Akron Solar will include one 10-12 acre main temporary laydown yard, as well as 2-8 smaller temporary yards less than 5 acres in size distributed throughout site. The main laydown yard will house construction trailers, equipment storage, and employee parking. The smaller yards will act as staging areas to allow equipment to be placed closer to the installation location. The laydown areas will be restored to pre-construction condition once construction is completed.

## 3.3 Clearing and Grading

Following site mobilization, the construction contractor will begin site preparation, clearing, and grading. The existing topography is relatively flat. Minimal grading is anticipated to be required. The entirety of the Project Boundary is currently planted in red pines for pulp wood harvest. The majority of tree clearing will be completed by the current landowner according to their pulp wood/wood harvest agreements. Any remaining clearing and grubbing will be conducted by the solar contractor and will be avoided to the greatest extent practical.

## 3.4 Site Road Construction

Ten-foot-wide site roads through the array will be constructed to provide access to public roadways and on-site equipment for construction and operation. Twenty-foot-wide access roads will be used to access the Collector Substation and BESS yards. The roads will be constructed primarily at grade and comprised of gravel to maintain the site drainage characteristics. Culverts may be installed in areas of confined/preferential flow to maintain surface water flow under the constructed access roads. Construction of the internal site roads will begin by removing the topsoil and organic material. The subgrade will be compacted and constructed per civil design requirements. A layer of road base will then be added and compacted.

## 3.5 PV Solar Array, PCU, and BESS Assembly and Construction

Construction of the PV array areas will begin by driving the steel piles in the ground. Shortly after the start of pile installation, tracker system installation will begin followed by PV panel installation. These three activities will occur simultaneously throughout the Project site. The DC cable will be

connected once the PV panels are installed. Separately, the PCUs and BESS units will be delivered and installed at their respective locations within the arrays.

## 3.6 Electrical Collection

The AC collection cable will primarily be installed underground in direct buried trenches. The sequence is as follows: (1) strip the top soil; (2) dig trench to a depth of approximately 30 to 48 inches; (3) the cables will be direct buried and the bottom of each trench will be lined with clean fill; and (4) the remainder of the trench will be back-filled with excavated materials (subsoil overlain with salvaged topsoil and appropriately compacted). Some segments of the collection-system cable may need to be installed using horizontal directional boring.

## 3.7 Collector Substation and Gen-Tie

Construction of the Collector Substation and gen-tie will occur concurrently with the PV array. Construction of the Collector Substation will take approximately 4-6 months and gen-tie construction will take approximately six months.

For the Collector Substation, civil grading will be required to bring the pad to the engineered elevation. After the pad is complete, foundation work will commence. The foundations will consist of both poured piers and poured-in-place slabs. Grounding and underground conduit trenching will be constructed at the same time as the foundations. Once foundations, grounding, and conduits are completed the installation of steel structures will commence. Once steel is erected, specialty equipment will be set and wired.

Construction of the gen-tie will take place either concurrently or following the completion of the Collector Substation. Structures for the gen-tie will most likely consist of wood or steel monopoles directly embedded or on concrete foundations with guy wires, depending on the final designed span lengths and line loads.

## 4 Site Stabilization and Protection

Best Management Practices (BMPs), such as temporary seeding and silt fences, will be implemented prior to commencement of civil work. Erosion-control measures will be installed per the SWPPP and Erosion Control Plan. Temporary seeding and erosion control BMPs will be installed following initial grading and upon completion of array construction activities. Seeding of disturbed areas with native grass and herb species will be done using hydro-seeding, seed drill, or broadcasting.

During construction, dust will be controlled by applying water to exposed areas using water trucks.

# 5 Environmental Attributes of the Proposed Study Area

Approximately 2,409 acres of land are being considered for the location of the Project, (Project Boundary, which is also the Study Area). The Project Boundary was field surveyed in May 2023 and September 2024 to identify existing natural resources including land cover, wetlands, waterways, invasive species, and existing habitat (T&E species).

## 5.1 Land Cover Types

Land cover within the solar generation and gen-tie Project Boundary was mapped in the field during the wetland and waterway surveys conducted in May 2023 and September 2024. Dominant land cover types associated with the Project Boundary include upland woodland (red pine timber). Land cover was digitized within the Project Boundary using Geographic Information System (GIS) applications. The following table summarizes the land cover types and approximate acreage within the Project Boundary.

Acres of Land Cover Categories in Project Boundary (Solar and Gen-Tie)					
Lan	Acres	Percent of Total			
Non-Agricultural Upland	Upland Woodland	2,287.96	94.9%		
	Grassland	58.14	2.5%		
Developed Land	Developed/Non-Residential	62.91	2.6%		
	<u>Total</u>	2,409.01	100%		

## 5.2 Wetlands and Riparian Areas

Preliminary wetland determinations involved a desktop review of the Project Boundary that included the use of available resources such as U.S. Geological Survey topographic maps, U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey, WDNR Wisconsin Wetland Inventory mapping, WDNR 1:24,000 Hydrography data (24k Hydrolayer), USDA National Agricultural Imagery Program, and other publicly available aerial imagery.

An ArcGIS Online mapping site was developed and utilized during wetland and waterway field surveys completed in May 2023 and September 2024. Field determinations were based on the criteria and methods outlined in the U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual, Technical Report Y-87-1 (USACE 1987) and subsequent guidance documents, and applicable Regional Supplements to the USACE Wetlands Delineation Manual.

A total of 12 data points were used to complete the wetland delineation field surveys within the Project Boundary. No wetlands were identified during the field investigation. The Project Boundary

was primarily dominated by varying stands and age class red pine plantation with smaller amounts of open, upland grassland communities.

Preliminary waterway determinations were made utilizing the WDNR 24k Hydro layer and data imported into the GIS application. Desktop analysis revealed no waterways located within the Project Boundary. Field surveys for waterbodies were conducted during the wetland investigations. No waterways or open water areas were surveyed within the Project Boundary.

## 5.3 Federal and State Listed Species

The Project Boundary and associated one-mile (wetland and terrestrial species) and two-mile (aquatic species) buffers were evaluated for the presence of federally and state-listed species and their habitat. These species were evaluated to determine if the Project may adversely affect them or their habitat.

### 5.3.5 Federally Listed Species

On September 26, 2024, Akron Solar's consultant requested an Official Species List report for the Project from the U.S. Fish and Wildlife Service (USFWS). The consultant submitted an effect determination to the USFWS using the Minnesota-Wisconsin DKey within the Information for Planning and Consultation (IPaC) system and received a Consistency letter (Project code: 2024-0149383). The Consistency letter, and any other letters of correspondence with USFWS will be included in the CPCN application.

The preliminary Official Species List included the following federally listed species that may occur in the vicinity of or may be affected by the Project:

- Eastern Massasauga rattlesnake (*Sistrurus catenatus*) Eastern Massasaugas are in the geographical range of the Project Boundary. However, do to the lack of wetlands and lack of suitable habitat (floodplain habitats along medium to large rivers, especially near river confluences, where they primarily occupy open canopy wetlands, such as sedge meadows, fresh wet meadows, shrub-carr, and adjacent upland prairies, floodplain forests, and old fields) in the Project Boundary, negative impacts to this species are not anticipated.
- Gray wolf (Canis lupus) Gray wolves are in the geographical range of the Project Boundary. However, due to the mobility of the species and the highly disturbed edge and agricultural fields present in the Project Boundary, negative impacts to this species are not anticipated.
- Karner Blue Butterfly The Karner blue butterfly (*Lycaeides melissa samuelis*) occurs in pine barrens and oak savannas on sandy soils containing wild lupine (*Lupinus perennis*), the only known host plant of Karner blue butterfly larvae. The Project Boundary is located within the known range of the Karner blue butterfly in Wisconsin. According to the USFWS official species list, the Project Boundary is located within proposed critical habitat for the Karner blue butterfly.

- Monarch Butterfly The monarch butterfly (*Danaus plexippus*) is a "candidate" species within the iPac species database. For this Project, specific mitigation measures are not likely to be required.
- Salamander Mussel (Simpsonaias ambigua) Salamander mussels may use mud, silt or sand substates beneath medium to large sized rock and undercut ledges of large river systems. Due to the lack of suitable habitat within the Project Boundary, negative impacts to this species are not anticipated.
- Whooping crane (*Grus americana*) Whooping Cranes may use the agricultural fields within the Project Boundary during migration. Due to the lack of quality stopover habitat within the Project Boundary, negative impacts to this species are not anticipated.

**NOTE:** The species list provided above is preliminary in nature and is "not for consultation." A final IPaC review will be submitted to USFWS, and all resulting information provided by the USFWS will be included in the CPCN application.

#### 5.3.6 State-Listed Species

A preliminary Endangered Resource (ER) Review was completed for the Project on September 25, 2024. A Certified ER review request was submitted to the WDNR (Stacy Rowe – WDNR) on September 25, 2024. The final ER review (ERR24-1142) for the Project Boundary was received on November 14, 2024 and will be included in the CPCN application.

Fourteen species were listed as Element Occurrences (EOs) for the Project including one bird, one plant, one dragonfly, two herptiles, three butterflies, and five communities. The WDNR response indicated that suitable habitat may be present for three species within the Project Boundary.

## 5.3.7 Special Management Areas

An evaluation of GIS databases was used to document special management areas within the Project Boundary and an associated two-mile buffer. There are no national parks, state parks, national forests, state forests, county forests, state natural areas, or Tribal land within 2 miles of the Project Boundary. There are a total of 2 county parks and 4 local parks within 2 miles of the Project Boundary.

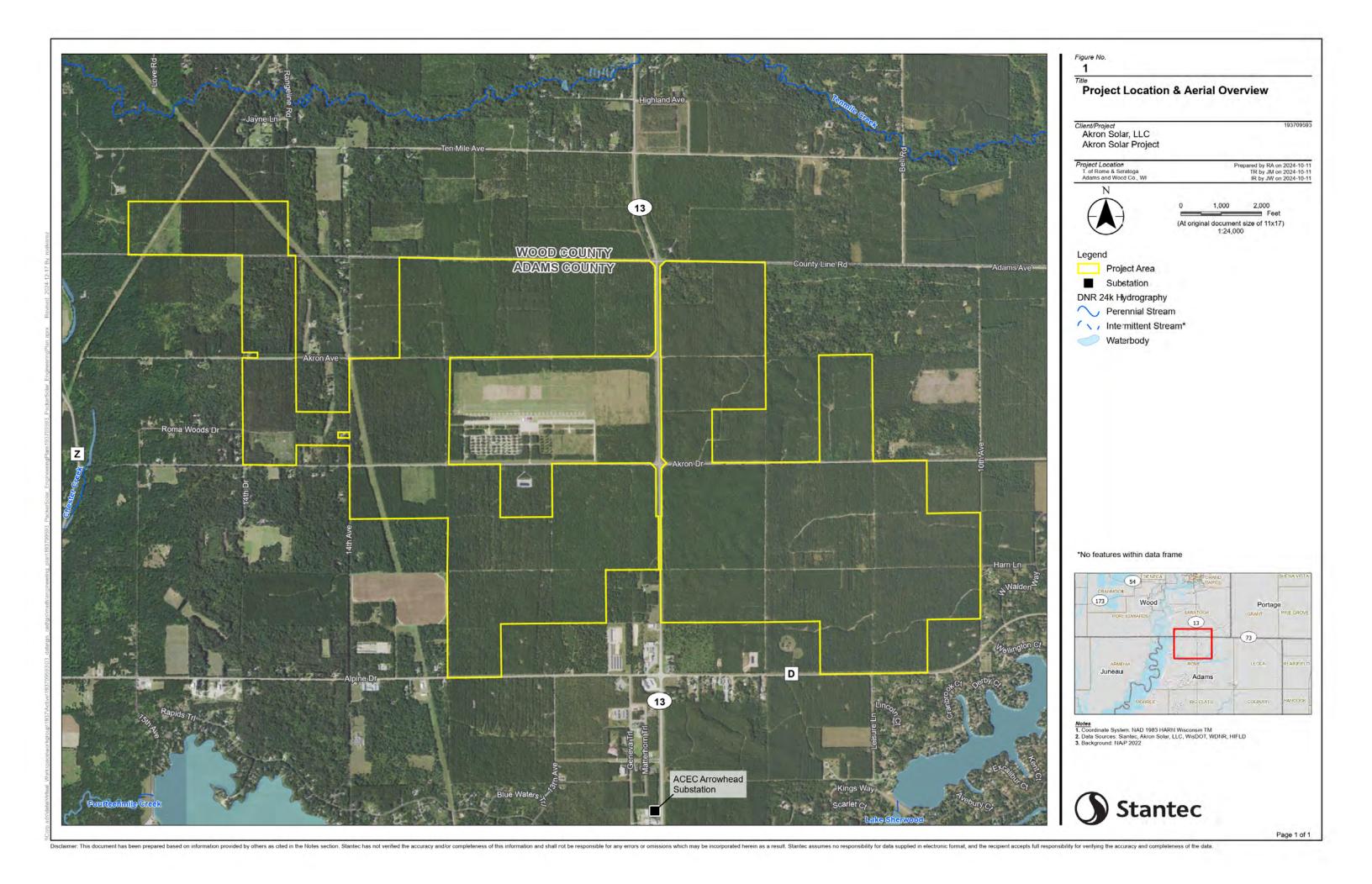
## 6 Required Permits

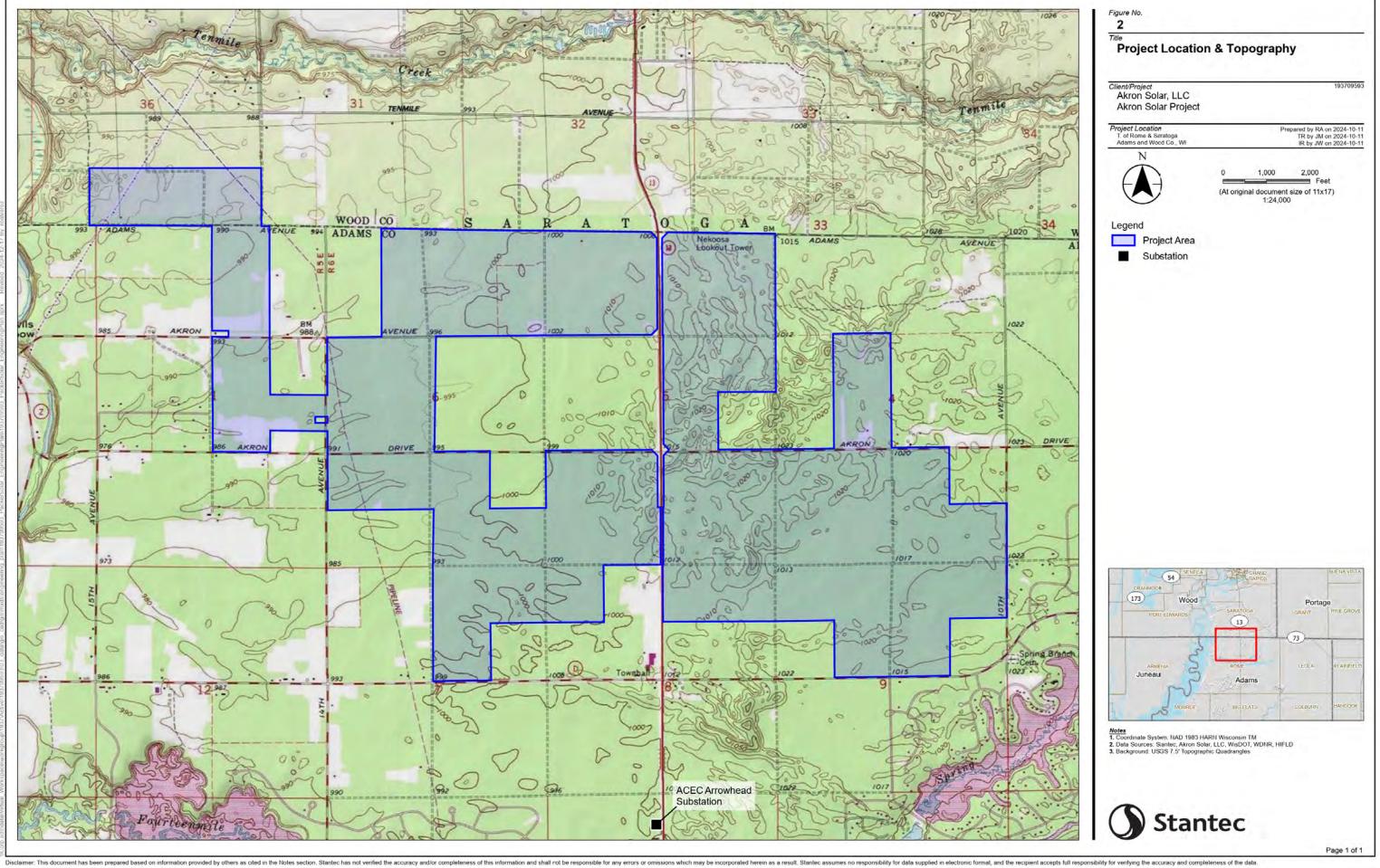
Permits and agency coordination at the Federal and State level will be completed as necessary prior to the construction of the Project. Permits to be applied for will be determined based on Akron Solar's final engineering following issuance of a Final Decision in the CPCN proceeding. In addition to the permits identified in the table below, Akron Solar may apply for local permits to facilitate cooperation with local governments. If local permits are withheld or delayed subsequent to issuance of a CPCN, installation of the facility may proceed in accordance with Wis. Stat. § 196.491(3)(i). A list of expected permits and coordination for the Project is summarized below:

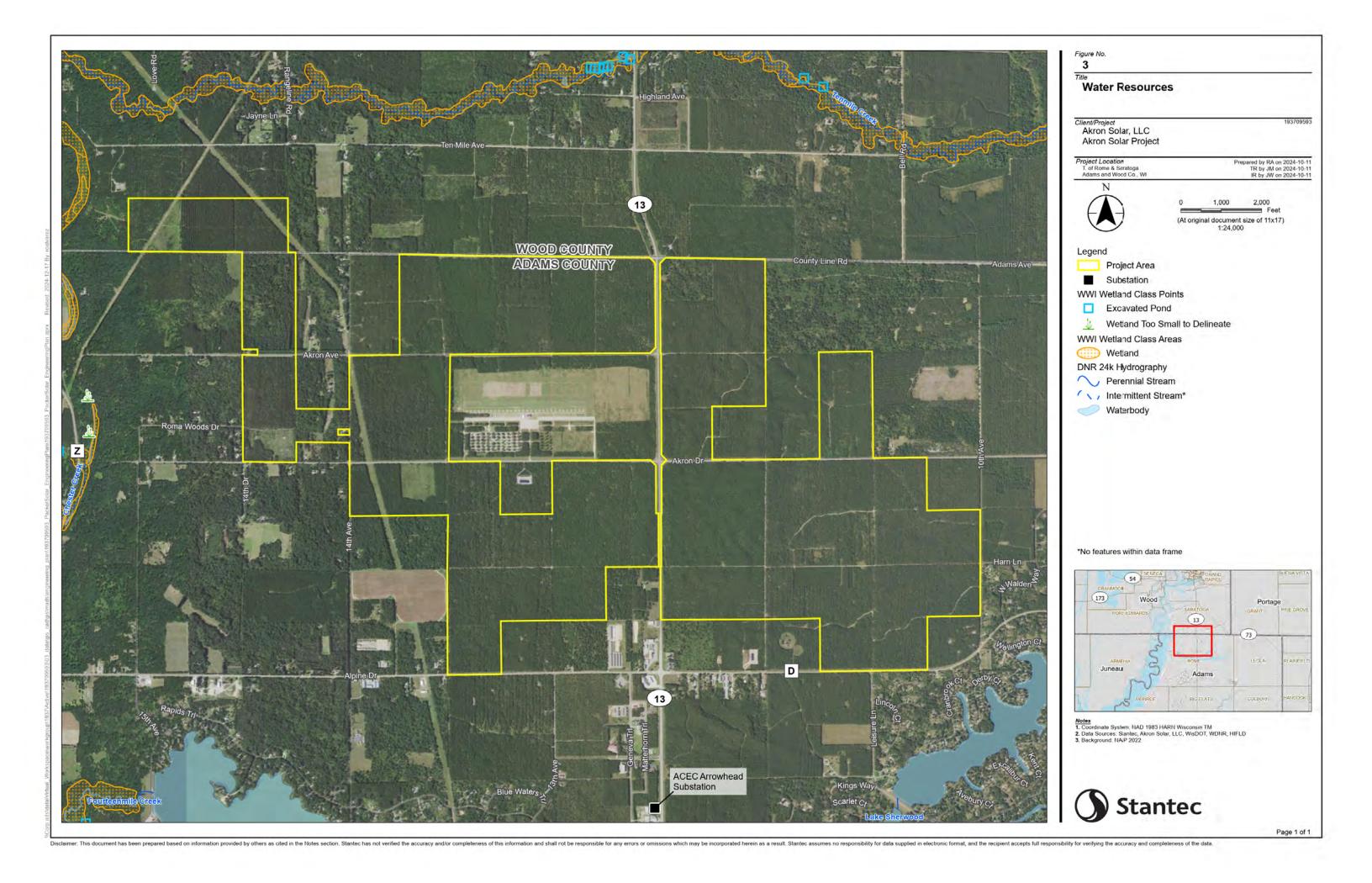
Expected Permits and Agency Coordination for the Akron Solar Project				
Permit/Coordination	Agency	Comments		
CPCN	PSCW	Filed for new electric generating facilities of 100 MW or more, and new electric transmission lines both greater than 1 mile in length and operating at 100 kV or more.		
Federal ESA Coordination	USFWS	Online IPaC completed 9/26/24.  USFWS response received 9/26/2024.		
	USACE	If required, will be filed with WDNR Wetland Water Ouality Certification Application.		
Section 404 Wetland Permit		Expecting to avoid resources for solar generation facility and gen-tie and have no need for a permit or to minimize impacts to fall under a Nationwide Permit (NWP).		
Wetland Water Quality Certification – Section 401	WDNR	To be filed concurrently with PSCW CPCN Application (Joint Application process).		
Utility Wetland and Structure/Bridge General Permit	WDNR	Concurrent with above - all filed under the WDNR's Water Resources Application for Project Permits (WRAPP).		
Wisconsin Pollutant Discharge Elimination System (WPDES) Construction Site Storm Water Runoff General Permit No. WI- S067831	WDNR	Final application filed following receipt of CPCN order from PSCW and final design is completed.		
State Endangered Resource (ER) Review	WDNR	ER Review sent to agency on 9/25/2024. The final ER Review will be reviewed with WDNR prior to the CPCN application.		
Archaeological and Cultural Resource Coordination	PSCW/Wisconsin State Historical Society (WHS)	Database review completed June 2023 and August 2024.		
		Field surveys completed September 2024.		

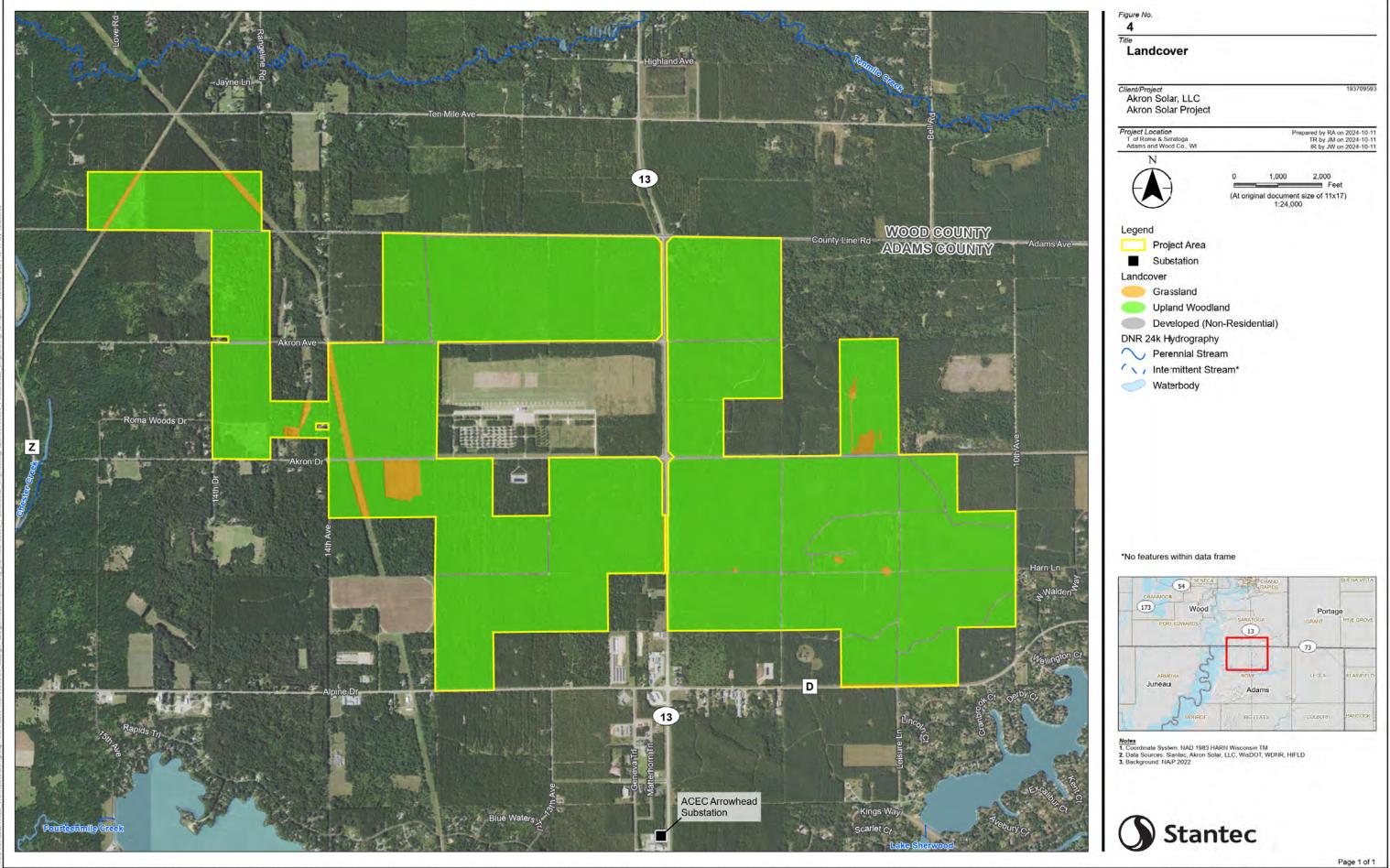
# 7 Proposed Project Schedule

Akron Solar expects to file its CPCN application in the Q1 2025. Akron Solar then anticipates receiving the required regulatory approvals by Q1 2026. Construction is anticipated to begin as early as Q4 2026 and be completed by Q4 2029.









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