GARNET ENERGY CENTER

Case No. 20-F-0043

1001.18 Exhibit 18

Safety and Security

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Exhibit 18: Safety and Security

This Exhibit will track the requirements of Final Stipulation 18, dated March 5, 2021, and therefore, the requirements of 16 New York Codes, Rules and Regulations (NYCRR) § 1001.18.

18(a) Preliminary Plan for Site Security during Construction of the Project

Safety and security are of the highest priority to the Applicant and NextEra Energy Resources, LLC (NextEra). Safety and security risks are anticipated to be minimal during both construction and operation of the Project, as they have been on other NextEra solar energy and energy storage projects. Having experience on more than 2,600 megawatts (MW) of solar projects across North America, NextEra puts safety at the forefront of the organization's priorities and as such, has a proven record of mitigating safety and security risks year after year.

Safety has deep roots in NextEra's culture. NextEra constantly strives to be role models within the industry, and evidence of its *"ZERO Today!"* philosophy that all injuries are preventable can be found throughout the company. Since launching *ZERO Today!* in 2008, NextEra has deepened its commitment and safety by working to turn its vision into a reality for the company's employees, contractors, and suppliers.

The substance of the *ZERO Today!* philosophy is as follows:

> *Our vision for NextEra safety is to establish and promote a safety culture based on the principle that ZERO injuries is the only acceptable target. We will provide support for business unit activities that clearly identify expectations for all levels of NextEra employees, and establish agreed upon consequences for exceeding, meeting, or failing to meet those expectations. NextEra expects each employee and contractor of NextEra to work safely in order to return home at the end of the day, injury free.*

Specific actions to improve safety performance include:

- Safety meetings and safety communications are conducted to educate employees on safety risks and share best practices for risk mitigation.
- Employee observation programs are used to identify risks in the field, leading to focused injury prevention countermeasures.

- NextEra's Safety Information Management System captures all information on injury events, unsafe conditions, and near misses. This information then drives a heightened level of safety responsibility and prevention among employees, supervisors, and managers.
- Employees at each work location perform baseline hazard assessments to identify risks and mitigation strategies. These routine, periodic assessments and inspections ensure corrective measures are developed for newly identified hazards.
- Employees are trained on advanced incident investigation techniques and root cause identification software. The software helps determine employee, management, and system failures and prompts users to identify and assign appropriate countermeasures to address the risks.
- Employees are trained on "Peer-to-Peer" coaching to successfully address unsafe behaviors before an injury event or near-miss occurs.

NextEra is committed to maintaining a safe working environment, including using contractors and suppliers with a demonstrated commitment to safety. NextEra's contractors and suppliers are expected to demonstrate an Experience Modification Rate (EMR) for safety purposes that is equal to or better than average for their industry. An EMR is a ratio that indicates how a company's Workers' Compensation losses compare to those of other companies with similar classifications.

NextEra maintains specific guidelines for the implementation of these goals and invokes them as requirements within contractual agreements with suppliers.

(1) Access Controls

The Project will employ multiple security systems to prevent access by the public. The security systems have been designed in accordance with the policies, procedures, and measures developed for the Project's security program.

Temporary gates and signs may be utilized along access roads during construction to control public access to the Project Area if deemed necessary. The gates would be secured after hours when construction operations are not being conducted. Fencing with gates may be used at laydown and storage areas throughout construction, as well as around hazardous areas. The gates will have a drop rod and latch closure with a locking mechanism. Refer to the Preliminary Design Drawings in Appendix 11-1 for additional fencing and gate details.

The Applicant has entered into lease or purchase agreements with the landowners, which provide the expectations for both parties relative to accessing each Project parcel during construction.

(2) Electronic Security and Surveillance Facilities

The Project will not utilize electronic security and surveillance during the construction phase. Should the Applicant determine electronic security and surveillance is needed, however, the appropriate systems will be established for monitoring and surveillance of the Project.

(3) Security Lighting

The majority of construction will occur during daylight hours; however, if security lighting is deemed necessary, the lighting will be manually controlled. Exterior lighting will be strategically placed across the Project Area during construction, as needed, to identify perimeters, gates, and vehicle gate openings. Exterior lighting will also be strategically placed around the substation and switchyard to enhance worker safety while also preventing light trespass onto adjacent properties. Security lighting is not proposed during non-construction work hours.

Security lighting will be maintained at the minimum levels needed to accomplish the associated task and will only be used when necessary. Visual disturbances will be minimized by the strategic lighting placement and limited lighting use, while providing adequate security for the Project.

(4) Setback Considerations

The Project setbacks have been determined by factors including, but not limited to, local ordinances, noise, available land, environmental factors, landowner preferences, etc. The proposed solar arrays will be located a minimum of 250 feet from adjacent landowners. Accordingly, construction will be located away from the Project Area boundaries and internal to the site.

18(b) Preliminary Plan for Site Security during Operation of the Project

(1) Access Controls

Perimeter fencing will serve as the initial security at the Project during operation. The proposed 7-foot tall permanent fencing will enclose the solar panel arrays, energy storage systems, and the interconnection facilities. Gates will be placed in multiple areas along the fencing for access by operation and maintenance personnel and for emergency access. Gates will be outfitted with a

“Knox Box” type locking system (or similar) to allow Project access by emergency personnel. Additional access controls are not anticipated for the Project.

Signage will be posted at access points and incrementally along the fenced perimeter. The signage will warn of no trespassing as well as provide safety information. The Applicant will address the need for additional access controls on an as-needed basis.

(2) Electronic Security and Surveillance Facilities

Should the Applicant determine electronic security and surveillance is needed during operation, security cameras and other appropriate systems will be installed for monitoring and surveillance of the Project. The need for electronic surveillance may be triggered by, but is not limited to, attempted access by unauthorized personnel, civil disturbances or vandalism, and/or an increased risk of safety or security concerns related to actions by unauthorized personnel. These incidents tend to be isolated and infrequent, therefore the Applicant does not expect there will be a need for electronic security and surveillance facilities.

(3) Security Lighting

The Project will utilize manually operated exterior lighting as necessary during operation of the Project. Security lighting will be installed only at the collection substation and switchyard; no lighting is required for the solar arrays. The lighting will be strategically placed around the substation and switchyard to emphasize worker safety while eliminating light trespass onto adjacent properties. The Preliminary Design Drawings in Appendix 11-1 detail the lighting plan and specifications. Security lighting will be maintained at the minimum levels needed to accomplish the associated task and will only be used when necessary. Visual disturbances will be minimized by the strategic lighting placement and limited lighting use, while providing adequate security for the Project.

Electricity for the security lights will be provided from the station service power and from a distribution line from the local utility for emergency backup power. Full cut-off fixtures and task lighting will be used at the substation and switchyard where feasible, as specified on the lighting plans. Drop-down optics are not proposed for the Project.

(4) Lighting of Project Components to Ensure Aircraft Safety

Components greater than 200 feet in height are not proposed for the Project; therefore, aircraft obstruction lighting is not applicable, and the Project will not compromise aircraft safety.

(5) Setback Considerations for Public Safety

The Project setbacks have been determined by factors including, but not limited to, manufacturer recommendations, company standards, available land, local laws, noise, and environmental factors. The proposed solar arrays will be located a minimum of 250 feet from adjacent landowners, 100 feet from adjacent landowner parcel boundaries, and 50 feet from public road rights-of-way (ROWs). Refer to Exhibit 31 for a detailed discussion of Project setback information.

(6) Setback Considerations for Wildlife and Habitats

Setback considerations with respect to wildlife and habitats are presented in Exhibit 22.

(7) Cyber Security Program

Protection of digital computer and communication systems demonstrating compliance with federal Department of Commerce's National Institute of Standards and Technology, the North American Electric Reliability Corporation (NERC), or International Organization for Standardization will be used by the Applicant.

With regard to cybersecurity of the Project's digital networks and communication systems, the Applicant will comply with NERC's Critical Infrastructure Protection (CIP) standards. The Applicant maintains a facility in Juno Beach, Florida that is compliant with the necessary NERC CIP standards. All firewalls and servers are monitored 24 hours a day, 7 days a week by a Security Operations Center. NextEra employees are required to complete training in information security awareness. Periodic validation of compliance with the applicable standards will be conducted by an independent auditor.

18(c) Preliminary Response Plan

NextEra's safety policy is to establish and promote a safety culture based on the principle that ZERO injuries is the only acceptable target. NextEra's historic safety record is a testament to the effectiveness of the safety policy and subsequent standard operational procedures established at each and every facility/project. Methodology for this specific Project is based on historic experience at over 37 other utility-scale solar sites. The Applicant will effectively implement similar practices to ensure that safety and security risks remain minimal during construction and operation. The Applicant has attached a Site Security Plan and an Emergency Response Plan (ERP) for the Project, which are included in this Application as Appendix 18-1 and 18-2, respectively. The ERP incorporates best practices that have been developed and refined for over

two decades at NextEra's solar projects throughout the country. As discussed further in Section 18(h) below, the Preliminary ERP has been provided to local first responders for review and comment and the Final ERP will be provided as a compliance filing.

(1) Contingencies That Would Constitute a Safety or Security Emergency

Below is a list of contingencies that could constitute a safety or security emergency:

- Natural emergency, severe weather;
- Fire;
- Physical threat, security breach, crime;
- Cyber security;
- Environmental accident, spill; or
- Injuries and/or serious health conditions.

(2) Emergency Response Measures by Contingency

Below are brief descriptions of emergency response measures by each contingency category listed in Section 18(c)(1) above. The ERP found in Appendix 18-2 of this Application describes the emergency response actions for each contingency in greater detail. Below are general emergency response measures that apply to all contingencies.

- It is the responsibility of the Site Leader to assess a developing emergency situation and initiate the appropriate actions in the ERP to protect personnel, the surrounding environment, and the Project equipment from adverse damage.
- In the event of an emergency where personnel should be protected, call 911 immediately and then contact NextEra's Renewable Operations Control Center (ROCC), also known as central operations.
- Based upon the type and extent of the emergency, the Site Leader should assess whether an evacuation should be initiated.
- If the Site Leader determines that a Project evacuation is necessary, he/she must determine which type of evacuation to direct (immediate or delayed).

Natural Emergency, Severe Weather

Natural emergencies and severe weather events include, but are not limited to, tornadoes, flooding, hurricanes, blizzards/heavy snowfall events, high wind conditions, earthquakes, and severe thunderstorms. In addition to the general emergency response measures listed above, contingency-specific measures include:

- The Site Leader at the Project will monitor weather-related emergencies. The Site leader is provided climate/weather assessments from the NextEra ROCC daily and monthly. Information and warnings are also available via local radio, television, and internet weather and news sites and via ROCC.
- When information is received that a severe weather watch or warning has been issued, the Site Leader should notify their Manager and site employees.
- The Manager will determine if the Project should be shut down due to the weather situation. When severe weather is forecasted such as high winds associated with a hurricane, or other related conditions such as floods, considerations for equipment shutdown should be taken consistent with the Project's operating practices and plans that ensure safety considerations first.
- The following list represents actions that should be taken in order to secure the Project Area. The list is not intended to be all inclusive and will vary in applicability pending advance warning of the onset of the event.
    - Ensure Project personnel are safe and accounted for.
    - Seek safe shelter. If in your vehicle in winter, ensure the possession of a survival kit and adequate levels of gasoline.
    - Ensure all portable equipment, trash cans, tools, etc. are stored indoors.
    - Ensure that the construction trailers and equipment doors are closed and latched.

Fire

There is a very low likelihood that a fire would occur at a photovoltaic (PV) solar facility. The solar field itself has no substantial fuel source to support a fire, the panels are primarily metal and glass, and the modules do not generate heat. Vegetation grown within and under solar arrays will consist of grasses that have a maximum growing height of 2 to 2.5 feet and are maintained at lower heights to avoid the potential for shading on arrays. There are also multiple layers of quality

assurance and control to monitor the installation and maintenance of the Project components. The inverter units and pad mounted transformers contain no hazardous materials (the inverters and pad mounted transformers are typically either air-cooled or contain mineral oils). In the event a piece of equipment did catch fire, the lack of fuel in the solar field prevents the fire from spreading.

The Project, including energy storage systems, will be monitored 24/7 by the Applicant's Renewable Operations Control Center (ROCC) located in Juno Beach, Florida. The energy storage system containers have smoke alarms/fire detection systems. Fires are detected by the use of photoelectric smoke detectors and thermal detectors. Each module will have a temperature sensor that will shut down the system if a condition out of the normal range is reached. Alarms generated from the smoke detector will trigger remote alarms to the ROCC. In the event of an emergency, the ROCC will shut down necessary equipment remotely and contact the Site Leader who will arrive on site as soon as practicable. Activation of the detectors will also trigger an audible/visual alarm on the exterior of the containers. Additional safety control measures for the energy storage systems is included in Exhibit 15(g).

Potential sources of fire related to the construction and/or operation of the Project include electrical shorts and malfunctions, vehicle exhaust systems, welding and cutting, fueling, and improper flammable liquid storage. Potential causes of fire not associated with construction and/or operation activities could include controlled burning activities, other structure fires, arson and smoking. A best practice to prevent fires is to maintain excellent housekeeping. Any accumulation of combustible material should be reported during the daily meeting during construction or the regular Project Area inspections during operation.

All construction workers and Project personnel shall be trained for potential fire hazards related to their job at the Project facility. New and transferred personnel shall be trained in the fire prevention plan prior to beginning their assigned duties. Should a change to fire prevention and response occur, all Project personnel shall be trained in any fire plan revisions. In addition to the general emergency response measures listed above, contingency specific measures include:

- Any Project personnel who discovers a fire within the Project Area should immediately make radio contact with the Site Leader, and provide the following information: a) that a fire has been discovered, b) the location and source of the fire, c) any injuries that have

occurred, d) the cause of the fire (if known), and e) actions he/she will be taking to extinguish the fire (if appropriate).

- Any Project personnel discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire if properly trained and conditions prove safe to do so. In general, a fire should be considered to be in its incipient stage if it meets two primary criteria: a) the fire can be extinguished or controlled with a single portable fire extinguisher, and b) the person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.
- As long as the fire is in its incipient stage, as defined above, the Project personnel discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. Fire-fighting efforts at the Project Area that are beyond the incipient stage will be performed by trained outside responders only if safe to do so. Should an electrical fire occur, persons are advised not to extinguish the fire, including emergency responders.
- Battery container doors should not be opened until conditions are verified safe and entry is approved.
- All Project personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the Project.
- In response to the fire, the Site Leader will need to determine if equipment needs to be shut down and activities ceased.
- Contact local emergency response services and provide the following information: a) type of emergency, b) magnitude and location, c) any immediate danger to people on and off site, d) any known injuries, and e) any other pertinent information.
- Project personnel shall escort emergency service to the location of the fire. Project personnel may also be called on to provide emergency services with specific information about the dangers of Project equipment, electrical sources, etc.

Physical Threat, Security Breach, Crime

Physical security incidents can include the following: intrusion, bomb threats, sabotage, vandalism, terrorism, or other similar security events at an electrical generation facility. If a Hostile Intruder enters the Project Area, each person shall quickly determine the most reasonable way to protect his/her own life. Visitors and contractors are likely to follow the lead of employees and

managers during a hostile intruder situation. In addition to the general emergency response measures, each person shall take the following actions, accordingly:

- Evacuate;
- Hide out;
- Take action (as a last resort and only when your life is in imminent danger); and
- Call 911 when it is safe to do so.

In the event that the Project receives threatening correspondence either by phone or by other means of communication, the following actions should be performed immediately:

- Gather as much information as possible from the person making the threat.
- If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted.
- If the threat is being made verbally (phone or otherwise), communicate and obtain information from the individual making the threat for as long as possible. For phone threats, note the time of the call, do not interrupt the caller and describe the tone of voice as well as any background sounds.

After information on the threat is gathered, inform the Site Leader, contact Security Operations, contact local law enforcement, as applicable (e.g., 911), then communicate the physical security event to all on-site personnel.

Cyber Security

Site personnel may become aware of a cyber-incident or the potential for a cyber-incident from a variety of sources, including email alerts, ROCC, an employee, a regulatory agency, a business partner, or an outside source. In addition to the general emergency response measures, once a cyber security threat is verified, emergency response measures include:

- The Site Leader makes the unit safe or stabilizes the unit as needed and plans the recovery, if appropriate.
- The Site Leader communicates with the appropriate parties:
    - Immediate Supervisor;
    - Corporate Security;

- ROCC;
- Local Emergency Services, if appropriate; and/or
- Transmission System Operator, if appropriate.

- The team restores the cyber assets affected by the incident to normal operations. This may require reloading data from backup tapes or reinstalling cyber assets from their original distribution media.
- Once the affected cyber assets have been restored, they are tested to make sure they are no longer vulnerable to the cause of the incident.
- The impacted system(s) is/are tested to ensure they will function correctly when placed back in production.

Environmental Accident, Spill

The spill or release of any chemical, oil, or heat transfer fluid is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. Prior to operation, a final Spill Prevention, Containment, and Control (SPC) Plan will be prepared, filed with the Secretary and also reviewed by Project Personnel. It is the policy of the Applicant that Project personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. In addition to the general emergency response measures, the basic actions to be taken in response to a chemical, oil, or heat transfer fluid spill or release are the following:

- If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) if it can be stopped without incurring additional personal exposure to the substance.
- The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, and if safe to do so under prevailing conditions, remain within observation distance.
- The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Site Leader should be notified immediately over the radio. Information provided should include all of the following that are known: a) what type of chemical has been spilled/released, b) the location(s) of the spill/release, c) if the source of the spill/release has been stopped, d) if any injuries or

chemical exposure to personnel has occurred, e) boundaries describing the area of the spill, f) whether or not the spill is contained, g) quantity released (if it can be estimated), and, h) environmental impacts to waterbodies, streams, wetlands, the ground, roadways, etc.

- Based upon the report from the person discovering the spill, the Site Leader shall evaluate whether the circumstances pose a threat to the surrounding community or the environment. If a threat is imposed to the community or environment, 911 should be notified immediately. The Site Leader shall also contact at least one of the following specialized emergency responders:

Table 18-1. Emergency Responder Contact Information

Organization	Expected Response Time	Contact Information
National Response Center	2-4 hours	1-800-424-8802
New York State Spill Hotline	Up to 2 hours	1-800-457-7362
New York State Department of Environmental Conservation (NYSDEC) Region 7	2-4 hours	1-315-426-7400
New York State Emergency Response Commission (SERC)	2-4 hours	1-518-292-2366
United States Environmental Protection Agency (EPA) Region 2	2-4 hours	1-877-251-4575
Safety Kleen	2-4 hours	1-888-375-5336

- While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundary of the spill and place absorbent mats over any drains that are near the spill location.
- The person discovering the spill should attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to prevent others from inadvertently approaching the spill area.
- Once the Site Leader has determined that adequate containment and barricading of the spill area exists, he/she shall ensure that an adequately trained observer remains

positioned a safe distance from the scene to observe the status of the spill and arrange for proper cleanup/mitigation actions.

Injuries and Serious Health Conditions

Project personnel should take the most aggressive response actions that are prudent in an emergency situation; the first and foremost action is to call 911 to initiate the response of trained outside medical responders.

To prepare Project personnel for such contingencies, it is the Applicant's policy that all operating personnel and as many other personnel as possible should be trained in cardiopulmonary resuscitation (CPR), blood borne pathogens, and in the use of an automated external defibrillator (AED).

At least one well stocked first aid kit will be maintained at the Project in the construction trailer. In addition, one kit will be placed in each Project vehicle. The first aid kits will be inspected at least monthly. Basic guidelines for response actions to be taken in the event of personnel health can be found in the ERP. Personnel at the Project will determine the location of their nearest non-emergency Worker's Compensation approved medical facility as well as the Occupational Nurse and post the name, address, and phone number. In the event of an emergency, the 911 responders will determine the best location for emergency care.

An AED will be maintained at the Project Area in a designed location known and accessible to all on-site staff. The AED will be tested on a regular basis and employees will receive annual training on its use.

Below are basic first response actions for injuries and health issues, as listed on the American Red Cross website (American Red Cross, 2019). More details and additional instructions for specific contingencies are contained in the ERP.

- Check for responsiveness. Responsiveness is when the person is able to respond when you call their name or touch them;
- If the person is unresponsive, immediately call 911 for outside medical assistance and ask other personnel to bring the AED (if present) to the scene;
- Check to see if the victim is breathing normally;

- If no signs of breathing are observed, the responder should check for visible signs of airway blockage. If obvious signs of airway blockage are observed, attempt to remove the blockage;
- If no signs of breathing continue, initiate two rescue breaths into the victim.
    - After the rescue breaths, a pulse should be checked for on the neck.
    - If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
    - If no pulse is observed, commence CPR with assisted breathing;
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim;
    - CPR should be continued during the time that the AED is being set up.
    - If the AED is placed into operation, remain near the victim and follow all AED instructions to endure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene;
- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, do not attempt to move the victim unless their immediate safety would be jeopardized by leaving them in that particular location. Make the victim as comfortable as possible and apply pressure to mitigate areas of bleeding until trained medical personnel arrive at the scene;
- Immobilize all injured parts of the victim; and/or
- Prepare the victim for transportation if the victim can be safely moved.

(3) Evacuation Control Measures by Contingency

The Applicant has two designated evacuation control measures, immediate and delayed, that apply to all contingencies. Below are summaries of the measures. Additional details including egress routes and muster areas will be available in the ERP.

Immediate Site Evacuation Procedure

- Locate and obtain the visitor/contractor sign-in sheet;
- Locate and obtain all immediately accessible hand-held radios;

- Determine the safest muster area to proceed to, depending upon the known circumstances of the emergency. Each segment of the Project Area should have an identified off-site muster area;
- Assign designated Project employees to assist any employee, visitor or contractor with special needs that would restrict their ability to get safely and expediently to the muster area;
- Pass the following information over the Project radio system:
    - The muster area the employees will be proceeding to.
    - Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet);
- Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area;
- Upon arriving at the designated muster area(s), the group shall designate a Person-in-Charge and take a head count of all personnel who are at the muster area, including contactors and visitors;
- All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location.

Delayed Site Evacuation Procedure

- Take the necessary operating actions to place the Project Area in the most stable condition, based upon the type of emergency;
- Locate and obtain the visitor/contractor sign-in sheet;
- When all visitors, contractors and non-essential operating personnel have been accounted for, the Site Leader shall designate a trained person to escort all non-essential personnel to the designated muster area along the safest egress route;
- Notify the ROCC of the current facility status and evacuation details;
- Perform a controlled shutdown in accordance with the appropriate procedures and directions;
- Once the shutdown has been completed, all essential personnel shall gather in the designated muster area and take roll call; and

- When all essential operating personnel are present and accounted for, evacuation shall be performed, unless the egress route is not safe for travel.

(4) Community Notification Procedures by Contingency

Community notification in the event of an emergency begins by calling 911 and contacting local emergency responders. If necessary, a Project representative will contact the landowner directly by telephone, electronic mail, text, and/or personal visit. Additionally, if necessary, the Site Leader will contact local governmental agencies, local utility providers, and/or other community stakeholders that may be impacted by an emergency. Emergency notification is the same for all contingencies. Communication timeframes and methods will depend upon the urgency of a particular event. Urgent notifications will be made in-person. Methods for non-urgent notifications will be determined on a case-by-case basis and may include notification via letter, doorhanger, email, text and/or telephone. The Master Stakeholder List of host or participating and non-participating landowners will serve as the pool of stakeholders to be contacted depending upon the nature of the event. Communications that were made will be recorded in a log and supplied to DPS Staff within 30 days after the contingency has been resolved.

The ERP and the Site Security Plan for the Project will be shared with the local emergency response teams. Local emergency response teams will be given an opportunity to review the plans, ask questions and provide suggestions. The Applicant understands the importance of coordination with local fire, police, and other emergency services. The Applicant will update local emergency response teams on the status of the Project and are made aware of potential safety and security emergencies. Preliminary introductions and discussions have been conducted with the County Emergency Management Office and local fire Chief as described in the Public Involvement Program (PIP) Plan meeting log, and additional discussions will occur prior to construction and the start of operations.

18(d) Provision and Review of Preliminary Site Security and Emergency Response Plans by the New York State Division of Homeland Security and Emergency Services

On January 8, 2021, the Applicant provided a copy of the plans required in Sections 18(a), 18(b), and 18(c) of this Exhibit to the New York State Division of Homeland Security and Emergency Services (DHSES) and requested that it review and provide comments on the ERP.

18(e) Statement of Emergency Response Plan Provision and Review Request by Local Office of Emergency Management

The Project is not located within any part of a city with a population over one million; therefore, this section of the Exhibit 18 regulation is not applicable.

18(f) On-Site Equipment and Systems to Prevent or Handle Fire Emergencies and Hazardous Substance Incident

On-site equipment and systems to prevent or handle fire emergencies and hazardous substance incidents include the following:

- Wall-mounted fire extinguishers at the construction trailer;
- Wall mounted first aid kits at the construction trailer;
- Emergency eye wash stations at the construction trailer;
- Portable first aid kits and eyewash bottles within construction vehicles;
- Portable fire extinguishers within construction vehicles;
- Spill containment units at the construction trailer and pre-determined locations across the Project;
- Safety vests;
- Safety masks, gloves and goggles;
- AEDs; and
- Backboard pallets.

18(g) Contingency Plans to be Implemented in Response to the Occurrence of a Fire Emergency, Hazardous Substance Incident, or a Gas Pipeline Incident

Section 18(f) summarizes the emergency response plans for a fire emergency and for a hazardous substance incident/spill. The closest pipeline to the Project is located within the ROW that cuts through the Project Area, is owned by the National Fuel Gas Company (National Fuel), and is operated by Empire Pipeline, Inc. The pipeline traverses through the northern portion of the Project, in an existing New York Power Authority (NYPA) transmission line ROW. In the unlikely event of a gas pipeline incident resulting from the Project's proposed fence construction over the pipeline or underground collection line installation beneath it, the Applicant will halt work and will contact the pipeline owner or owner's representative immediately. For incidents occurring

within the National Fuel ROW, Project personnel are directed to contact one of the following personnel:

Table 18-2. National Fuel Emergency Contact Information

Contact	Phone Number
Pat McNerney, General Foreman	1-716-432-3842
Shane Becker, Assistant General Foreman	1-716-289-2832
National Fuel 24-Hour Emergency Hotline	1-800-444-3130

Refer to Exhibit 12 and Appendices 12-4 and 12-5 for additional guidance regarding the gas pipeline and contact information for National Fuel. In addition, the ERP outlines the procedures to prevent, mitigate, and respond to an incident should it occur and provides contact information for emergency personnel.

A preliminary Stormwater Pollution Prevention Plan (SWPPP) has been prepared (see Appendix 23-3) and will be implemented for both the construction and operation phases of the Project. The SWPPP provides an assessment of potential hazardous substances that could be used during construction, operation and maintenance of the Project. The SWPPP includes protocols to be followed in the event of minor and major hazardous substance discharge events, as well as a Project-wide inventory of spill response equipment. The majority of potentially hazardous substances on-site consists of various oils such as hydraulic oil, mineral oil, and lubricating oil. Refer Exhibit 23 for additional information on the SWPPP. A SPC plan will be completed prior to construction/operation of the Project.

18(h) Emergency Response Plan Provision and Review Request by Local Emergency First Responders

On January 8, 2021, the Applicant consulted with the Cayuga County Emergency Management Services and local emergency service providers to inform them of the Project, seek input, and answer questions. The Applicant has provided a copy of the plans required in Section 18(c) of this Exhibit to the local emergency first responders serving the area of the Project and requested that they review the plans and will give them an opportunity to provide comments and ask questions. The Applicant has received comments from the County Emergency Management Services and will review all additional responses timely received from local emergency first

responders and adjust the plans if warranted. The Preliminary ERP included with this Application has been updated to address the County's initial comments.

18(i) Emergency Response Plan Contingencies and Responses

The ERP outlines the contingencies that would constitute a safety or security emergency, the appropriate response measure to be taken as a result of this emergency, any evacuation control measures that may be necessary, and the means by which the community will be notified of the emergency and any procedures that shall be followed. The Applicant has consulted with local emergency services providers to inform them of the Project, seek preliminary input, and answer questions. The Preliminary ERP included as Appendix 18-2 has been updated to address preliminary comments provided by the County. The Applicant will continue to work with local emergency responders to develop the ERP and finalize prior to construction and operation of the energy center.

18(j) Local Emergency Response Organization Training

Information will be provided and training will be offered to local emergency response organizations, including the Conquest Fire Company, Inc. and the Cayuga County Emergency Management Office to provide instruction on how to respond to emergencies that occur on or near solar and energy storage facility Components. The Applicant will work with the above listed emergency response organizations, as well as county and state safety officials, as appropriate, to provide trainings to emergency response leadership and their assigned staff as requested.

References

American Red Cross. 2020. *CPR Steps*. Available at: https://www.redcross.org/take-a-class/cpr/performing-cpr/cpr-steps. Accessed December 2020.