CORDELIO POWER

FLAT CREEK SOLAR

Permit Application No. 23-00054

§ 1100-2.7 Exhibit 6

Public Health, Safety, and Security

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Acronym List

BMP	Best Management Practices
CLCPA	Climate Leadership and Community Protection Act
FEMA	Federal Emergency Management Agency
IPCC	Intergovernmental Panel on Climate Change
LOD	Limit of Disturbance
MW	megawatt
NERC	North American Electric Reliability Corporation
NYCRR	New York Codes, Rules and Regulations
NYISO	New York Independent System Operator
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
O&M	operations and maintenance
ORES	Office of Renewable Energy Siting and Electric Transmission
POI	Point of interconnection
PPE	personal protective equipment
PSC	Public Service Commission
SEP	State Energy Plan
SPCC	Spill Prevention, Containment, and Control
SPDES	State Pollutant Discharge Elimination System
SRP	Safety Response Plan
SSP	Site Security Plan
USACE	United States Army Corps of Engineers
USC	Uniform Standards and Conditions

Glossary Terms

Applicant	Flat Creek Solar NY LLC, a subsidiary of Cordelio Power LP, the entity seeking a siting permit for the Facility from the Office of Renewable Energy Siting and Electric Transmission (ORES) under Article VIII of the New York State Public Service Law.
Facility	Flat Creek Solar, a 300 MW solar generating facility located in the Towns of Root and Canajoharie, NY. The proposed Facility components to be constructed for the generation, collection, and distribution of energy for Flat Creek Solar include solar panel modules, electrical collection system, collection substation, point of interconnection (POI) switchyard, access roads, laydown/staging areas, and other ancillary facilities.
Facility Site	The participating parcels encompassing Facility components, which totals approximately 3,794 acres in the Towns of Canajoharie and Root, Montgomery County, New York (Figure 2-1).
Study Area	The Study Area for the Facility includes a radius of five miles around the Facility Site boundary, unless otherwise noted for a specific resource study or Exhibit. The 5-mile Study Area encompasses approximately 108,667 acres, inclusive of the approximately 3,794-acre Facility Site.
Limit of Disturbance (LOD)	The area to which temporary construction impacts will occur, totaling approximately 1,637 acres.

Exhibit 6: Public Health, Safety, and Security

This Exhibit provides information required in accordance with the requirements of §1100-2.7 of the Article VIII Regulations. Exhibit 6 details measures to be employed to ensure public health, safety, and security during construction and operation of the Facility.

1(a) Avoidance and Minimization of Potential Adverse Impacts

The Applicant has made significant efforts to avoid and minimize potential adverse impacts on the environment, public health, and safety during construction and operation of the Facility. As described throughout the Application Exhibits and summarized in Section (a)(2) of Exhibit 2: *Overview and Public Involvement*, the Facility avoids, minimizes, and mitigates potential temporary and long-term environmental and public safety impacts to the maximum extent practicable, while providing benefits to public health through the reduction of carbon emissions.

The Flat Creek Solar Facility will be a zero-emissions electrical generation facility, providing energy to homes and businesses without the risk of air or water pollution. Unlike fossil fuel combustion, solar facilities do not produce greenhouse gas or pollutant emissions, such as carbon dioxide, nitrous oxides, and particulate matter, which directly and indirectly compromise public health and wellbeing (New York State Climate Action Council 2022, p. 101-103). As detailed in Exhibit 17: *Consistency with Energy Planning Objectives* of this Application, reducing pollutant and greenhouse gas emissions from the energy sector is a critical element of protecting the health and welfare of New York State (NYS or State) residents, as established in the 2015 State Energy Plan (SEP) (amended in April 2020) and the 2019 Climate Leadership and Community Protection Act (CLCPA). The State's existing energy system, which relies on fossil fuel combustion, is a significant contributor to adverse impacts on the State's public health and natural resources (New York Independent System Operator [NYISO] 2023; New York State Climate Action Council 2022, p. 99-103 & Appendix F). Reductions in emissions of greenhouse gasses improve air quality and strong reductions in emissions can help reverse some of the damage caused by global climate change, a significant threat to public health and safety (Intergovernmental Panel on Climate Change [IPCC] 2021; IPCC 2022; New York State Climate Action Council 2022). By reducing reliance on traditional fossil fuel generation sources, the Facility will reduce greenhouse gas and pollutant emissions associated with energy generation, thereby minimizing the public health and environmental impacts related to pollutant exposure and climate change.

As detailed in Exhibit 17: *Consistency with Energy Planning Objectives* of this Application, solar energy significantly contributes to the energy planning objectives of the SEP, promotes the objectives of the New York Public Service Commission's (PSC's) adopted Clean Energy Standard, and helps achieve the aggressive renewable goals of the CLCPA. In alignment with these policies, plans, and goals, the Facility will generate 300 megawatts (MW) of zero-emission, renewable, solar energy. The Facility will decrease the State's dependence on fossil fuels, thereby reducing harmful emissions and pollutants produced by fossil fuel combustion and diversifying the energy market for consumers. This net reduction in emissions will advance the State in meeting its ambitious emission and climate goals. The absence of air and water pollutants produced by the Facility during operation, and the net reduction of air and water pollutants due to a reduced dependency on fossil fuel combustion, will increase the health and wellbeing of the public. Renewable energy projects, like the Facility, are needed to combat climate change and protect the public health and welfare of NYS citizens.

Public health issues associated with the construction of the Facility are limited to typical risks associated with commercial construction projects. While some pollutant emissions are expected during construction of the Facility (through the generation of dust on dry days as well as the use of diesel and gasoline-powered equipment and vehicles), best management practices (BMPs) will be employed to reduce any impacts associated with these emissions to the extent practicable. Noise due to construction will be minimized through the use of BMPs. To further minimize noise and lighting impacts during construction, the Applicant will limit construction hours to 7am to 8 pm Monday through Saturday and 8 am to 8 pm on Sundays and national holidays, as required by State regulations. To promote safety during construction, the Applicant will notify the public prior to commencing construction activities and will coordinate transportation routes with the local public and Amish school, as described in Exhibit 16: *Effect on Transportation*.

During operation, the Facility will be maintained and operated safely and with minimal impacts to the surrounding areas. Noise impacts will be avoided or minimized through careful siting of Facility components, as described in Exhibit 7: *Noise and Vibration* and summarized in Exhibit 2: *Overview and Public Involvement.* Solar panels will have an anti-reflective coating to prevent glare impacts to surrounding residences and roadways, as described in Exhibit 8, *Visual Impacts*. The Facility will not produce odor, air, or water pollution during operation. The Facility components have no substantive fuel source to support a fire, as the panels are comprised of primarily metal and glass, and the inverters contain no hazardous materials; thus, there is a very low likelihood

that a fire would occur at the Facility. Battery energy storage is not proposed as a component of the Facility.

The Applicant has developed a Safety Response Plan (SRP) and Site Security Plan (SSP) (Appendices 6-1 and 6-2, respectively), which will be implemented during Facility construction and operation to ensure that any immediate safety concerns at the Facility are addressed timely and effectively. This includes coordination and training, as applicable, with the local fire department(s) and emergency responders.

The following sections discuss, to the degree applicable to the Facility, consideration of specific public health and safety risks, as required by §1100-2.7:

(1) Anticipated Gaseous, Liquid, and Solid Wastes Produced at the Facility During Construction and Operation

During operation, no significant gaseous, liquids, or solid waste will be produced by the Facility. One of the advantages of producing electricity from solar is that it does not produce gaseous, liquid, or solid waste during operation, and therefore, eliminates the need to treat, collect, transport, and dispose of such waste. Periodic maintenance and inspection of the Facility may generate small amounts of waste (e.g., cardboard, cleaning rags, and general refuse) that will be disposed of at appropriate landfill facilities.

During construction, the production of gaseous, liquid, and solid waste will be limited to the following activities:

- Standard operation of construction equipment;
- Standard operation of temporary sanitary facilities;
- General waste disposal associated with Facility construction;
- Production of concrete waste from concrete washout stations; and
- Clearing of vegetation.

The majority of gaseous, liquid, and solid waste that will be generated during construction of the Facility are a result of the standard operation of construction equipment and will be handled by the contractor in accordance with applicable laws and regulations pertaining to such wastes.

Construction equipment and vehicles will be fueled by unleaded gasoline and ultra-low sulfur diesel and will have operational mufflers. Construction equipment will be maintained to minimize gaseous emissions in accordance with applicable regulations. During construction, sanitary facilities used by workers will consist of on-site portable toilets, which will be emptied on an as-needed basis with waste hauled to licensed off-site disposal facilities, as described in Section 6(a)(4) below. Facility construction will generate relatively minor amounts of solid waste, including plastic, wood, cardboard, and metal packing/packaging materials, construction scrap, and general refuse. All such materials will be collected in on-site dumpsters, and disposed at a licensed solid waste disposal facility, as described in Section 6(a)(4) below.

During construction, concrete will be required for the construction of foundation pads for the collection substation. Concrete truck washouts will generate small amounts of waste during construction. Concrete washout stations located within the Facility Site will collect the waste from concrete trucks and prevent concrete from entering stormwater runoff or leaching into soils. Concrete waste will be removed and disposed at a licensed facility, as described in Section 6(a)(4) below.

A total of approximately 137.9 acres will be cleared from designated areas as indicated on the Design Drawings provided in Appendix 5-1. This includes approximately 71.5 acres of clearing with grubbing and 66.4 acres of clearing without grubbing. Vegetative clearing will be conducted as one of the first phases of construction activities and will be undertaken in coordination with landowners and in accordance with vegetative clearing and disposal provisions in §1100-6.4 of the “Uniform Standards and Conditions” (USC). Tree and vegetation clearing will be limited to the minimum necessary for facility construction and operation to the maximum extent practicable. The provisions of 6 New York Codes, Rules and Regulations (NYCRR) Part 192, ECL Section 9-1303 and any quarantine orders issued will be complied with during clearing activities. In areas of the facility where wood chipping will take place, wood chip depth will be no greater than three inches and wood chips will not be disposed of in wetlands, within stream banks, delineated floodways, or active agricultural fields. Disposing of vegetation or slash by burning will not occur. Vegetation or slash will not be buried within a wetland or adjacent area. Coordination with landowners to salvage merchantable logs and fuel wood will take place during the vegetative clearing activities. If merchantable logs and fuel wood will not be removed from the facility site, final construction plans will indicate locations of stockpiles. In accordance with the Invasive Species Management and Control Plan provided in Exhibit 11, construction employees will be trained to identify invasive

insects, such as the Asian Longhorn Beetle and the Emerald Ash Borer, prior to commencing vegetative clearing activities. If an invasive insect is observed, the occurrence will be reported to the New York State Department of Environmental Conservation (NYSDEC) as soon as practicable.

(2) Anticipated Volumes of Waste to be Released to the Environment at the Facility during Construction and Operation

No gaseous, liquid, or solid wastes will be released to the environment during operation of the Facility.

During construction of the Facility, a small amount of solid and gaseous wastes will be released to the environment; however, no liquid wastes will be released to the environment. The release of solid and gaseous wastes to the environment will be limited to wastes associated with standard operation of construction equipment and disposal of cleared vegetation. The only gaseous waste to be released to the environment during construction will be equipment exhaust, which will be at a volume consistent with standard construction activities. The only solid waste to be released to the environment during construction will be logs, brush, and chipped woody vegetation that result from vegetation clearing activities. Repurposing of salvageable, merchantable logs or fuel wood will be coordinated with landowners, and stockpiling of this material or otherwise disposal of vegetative debris will be performed in accordance with the handling provisions detailed in §1100-6.4 of the USC.

(3) Treatment Processes to Eliminate or Minimize Waste Released to the Environment

No further treatment processes to eliminate or minimize waste will be necessary as no additional volume of waste beyond that addressed in Section 6(a)(2) will be released to the environment by the Facility during construction or operation.

As stated in section 6(a)(2), salvageable, merchantable logs or fuel wood generated during construction clearing will be repurposed as practicable, in coordination with landowners.

As described in section 6(a)(1) and 6(a)(2), generation of wastes associated with standard operation of construction equipment will be handled by the contractor in accordance with

applicable laws and regulations pertaining to such wastes, including the provisions detailed in §1100-6.4 of the USC. Construction equipment will be maintained to minimize gaseous emissions to the environment in accordance with applicable regulations.

(4) Collection, Handling, Storage, Transport, and Disposal for Wastes Retained

As described in section 6(a)(1), temporary on-site sanitary facilities will store sanitary waste. These facilities will be emptied on an as-needed basis with wastes hauled to licensed off-site disposal facilities. General construction waste will be collected and disposed of in on-site dumpsters. A private contractor will empty the dumpsters on an as-needed basis, and will dispose of the refuse at a licensed solid waste disposal facility. Concrete waste will be collected in concrete washout stations throughout the Facility Site. Concrete will be removed and disposed by the contractor at a licensed facility. Concrete will be left to harden prior to off-site disposal.

Procedures regarding waste collection, handling, storage, transport, and disposal will be detailed in the Facility's Construction Operations Plan and Facilities Maintenance and Management Plan, which will be filed as part of the Pre-Construction Compliance Filing (16 New York Codes, Rules and Regulations [NYCRR] § 1100-10.2(e)(2) and (e)(3)).

(5) Study Area Maps and Analysis

Figure 6-1 shows the Facility Site and Study Area in relation to the following health, safety, and security resources, as applicable to the Study Area, based on publicly available data:

- Fire departments
- Police stations
- Bridges
- Dams
- Railroads
- Public and private water wells
- Chemical bulk storage facilities
- Petroleum bulk storage facilities
- NYSDEC-mapped remediation sites
- FEMA-designated flood hazard areas

- Landslide susceptibility

As shown on Figure 6-1, the Facility Site is located sufficiently distant from most health, safety, and security hazards. Hazards located within the Facility Site or immediately surrounding (within 1,000 feet of) the Facility Site include four public roadway bridges (Hilltop Road, Rappa Road, Flat Creek Road, Carlisle Road), two petroleum bulk storage facilities (located at the Milk Train, Inc. farm on Flat Creek Road, and at Ron Allen Trucking on State Highway 5S), and a flood hazard area associated with the Flat Creek. The Facility will be designed, sited, and constructed to avoid impacts to these identified bridges and petroleum storage facility. As previously mentioned in Exhibit 3, portions of the Facility Site are within a Federal Emergency Management Agency (FEMA) 100-year floodplain. In order to evaluate depths associated with the 100-year flood event, a Flood Hazard Study was conducted for the Facility Site. The Flood Hazard Study has been included as Appendix 3-5 of Exhibit 3 and shows areas within the Facility Site where potential 100-year flood event depths are greater than two feet. The Facility has been designed and sited to avoid the floodplain and Facility components will be placed outside of these areas. As shown on Figure 6-1, there are nine domestic water wells within or immediately surrounding (within 1,000 feet of) the Facility Site based on publicly accessible data from the NYSDEC Water Well Contractor Program. Public and private water wells are discussed in detail in Exhibit 13: *Water Resources and Aquatic Ecology*; please refer to Exhibit 13 for information regarding water wells. The Facility will be designed, sited, and constructed to avoid impacts to water wells and potable water as described in Exhibit 13.

As shown on Figure 6-1, landslide susceptibility within the Facility Site is very low to moderate. Storm surge zones, areas of coastal erosion hazard, and areas of geologic, geomorphic, or hydrologic hazard (aside from flood hazard) are not applicable to the Facility and are not shown on Figure 6-1, as there are none located within the Study Area.

(6) Significant Impacts on the Environment, Public Health, and Safety

No significant adverse impacts on the environment, public health, or safety are anticipated to occur as a result of Facility construction, operation, or decommissioning. As indicated in Sections 6(a)(1) through 6(a)(4), Facility construction and operation is not expected to impact the environment, public health, or safety due to gaseous, liquid, or solid wastes. Environmental impacts associated with gaseous, liquid, or solid wastes will be minimal and short-term, and

resultant only from typical construction activities, with no wastes generated during Facility operation. As indicated in Section 6(a)(5), no significant hazards exist within or surrounding the Facility Site that would compromise public or environmental health and safety as a result of Facility construction or operation. The Facility has been designed and sited to avoid or minimize impacts to natural resources and community resources to the maximum extent practicable, as described in Exhibit 11: *Terrestrial Ecology*, Exhibit 12: *NYS Threatened and Endangered Species*, Exhibit 13: *Water Resources and Aquatic Ecology*, and Exhibit 14: *Wetlands*. The Facility is not expected to result in impacts to noise or potable water, as discussed in Exhibit 7: *Noise and Vibration* and Exhibit 13: *Water Resources and Aquatic Ecology*, respectively. Thus, there are no environmental, public health, or safety risks expected in association with operation of the Facility. Both environmental health and public health are expected to benefit from implementation of the Facility, due to reduced reliance on non-renewable fossil fuels which produce greenhouse gases and pollution.

(7) Proposed Minimization Measures

As discussed above in Section 6(a)(6), adverse impacts to the environment, public health, and safety are not expected. The Facility has been designed in accordance with industry standards to avoid or minimize impacts to natural resources and community resources to the maximum extent practicable. Facility construction and operation will comply with relevant local, state, and federal regulations, which generally serve to minimize adverse impacts.

The Article VIII Regulations require public input into the environmental review of proposed development projects so that potential adverse impacts can be identified prior to implementation and appropriately avoided, minimized, or mitigated. Public input provided through the Article VIII Application process (e.g., groundwater well questionnaires, comments submitted during public outreach events) will be thoroughly reviewed, and necessary minimization actions will be implemented to address community concerns.

Beyond the Article VIII Regulations, compliance with other regulations governing the development, design, construction, and operation of the Facility also will serve to minimize adverse impacts. Permits will be obtained from the United States Army Corps of Engineers (USACE) for dredge and/or fill activities occurring to wetlands and waters of the U.S. under their jurisdiction. A State Pollutant Discharge Elimination System (SPDES) permit will be obtained from

the NYSDEC to ensure minimization of impacts to water resources. To the extent required, municipal road use agreements and New York State Department of Transportation highway permits will be acquired to minimize roadway safety impacts or traffic concerns, as outlined in Exhibit 16, *Effect on Transportation*.

For a detailed analysis of impact minimization measures to be implemented for a given resource, please see the respective Exhibits in this Application, including but not limited to the following:

- Exhibit 7. *Noise and Vibration*;
- Exhibit 8. *Visual Impacts*;
- Exhibit 10. *Geology, Seismology, and Soils*;
- Exhibit 11. *Terrestrial Ecology*;
- Exhibit 12. *NYS Threatened and Endangered Species*;
- Exhibit 13. *Water Resources and Aquatic Ecology*;
- Exhibit 14. *Wetlands*; and
- Exhibit 16. *Effect on Transportation*.

(8) Proposed Mitigation Measures

As discussed above in Section 6(a)(6), adverse impacts to the environment, public health, and safety are not expected. However, in an effort to reduce the potential for adverse impacts to the greatest extent, mitigation measures will be implemented during Facility construction and operation where appropriate. As discussed in Exhibit 8, where visual impacts of the Facility may be experienced by community members, vegetation screening will be implemented as agreed upon to mitigate visual exposure of the Facility. As discussed in Exhibit 2, public input provided through the Article VIII Application process will be thoroughly reviewed, and necessary mitigation actions will be implemented to address community concerns. For a detailed analysis of impact mitigation measures to be implemented for a given resource, please see the respective Exhibits in this Application.

(9) Proposed Impact Monitoring

During Facility construction and operation, a Safety Coordinator designated by the Applicant will oversee and monitor implementation of health and safety initiatives, including the Safety

Response Plan discussed in Section 6(c). The Applicant will prepare and follow an Operation & Maintenance (O&M) Plan to define monitoring and maintenance obligations during Facility operation. The O&M Plan will include prescriptions for routine maintenance and inspections of Facility infrastructure and equipment to mitigate the potential for spills, fires, and other emergencies. In addition to environmental inspections and/or monitoring that may be required, standard inspections will examine solar panels for wear and tear or other issues. Routine inspection of hazardous materials, wastes, equipment, and Facility infrastructure will be conducted to ensure compliance with best management practices. Routine equipment and infrastructure maintenance will be performed to avoid unnecessary incidents. Inspection and maintenance will mitigate the potential for spills, fires, and other emergencies.

1(b) Site Security Plan

The Applicant has prepared a SSP for operation of the Facility, provided as Appendix 6-1 to this Exhibit. The SSP describes the proposed security measures and procedures to be employed during Facility operation to prevent and minimize unauthorized access to the Facility and its infrastructure, thereby protecting the Facility, its employees, and the public. Final construction drawings, including details of security measures such as perimeter fencing and gating, electronic security and surveillance devices, lighting, and other required features specified in 16 NYCRR §1100-2.7(b), will be appended to the SSP and filed as part of the Pre-Construction Compliance Filing (16 NYCRR §1100-10.2).

The Applicant met with representatives from the following fire departments on April 17, 2024 at the Town of Canajoharie Fire Hall:

- Rural Grove Fire Department;
- Ames Fire Department; and
- Canajoharie Fire Department.

The Applicant reviewed and discussed the draft SSP with the local fire department representatives for discussion of the key components and measures for site security during both construction and operation of the Facility. Discussions included access for the fire departments and emergency responders via knox boxes at entry gates, a review of the preliminary lighting considerations at the Facility Site to minimize off-site effects while promoting a safe environment

for emergency responders (e.g., task lighting), as well as electronic surveillance and security alerts through the SCADA system to the Applicant. The SSP will be updated by the Applicant as warranted and will be enforced amongst all Facility employees and contractors. A summary of key security measures outlined in the SSP is provided below.

(1) Access Controls

To ensure site security, the perimeter of the Facility will be enclosed by a security fence with several gates for personnel or emergency access. All equipment and photovoltaic solar arrays will be within permanently fenced areas. These fenced areas will not be open to the public and will be restricted to Facility staff, vendors, suppliers, or other authorized personnel only. The perimeter fencing will be secured by self-locking gates to prevent unauthorized access into the Facility. Travel within the Facility will be facilitated by several access roads; within areas of Facility components, travel on these access roads will be restricted and will only be accessible after entering through a secured gate. Signs will be placed periodically along the perimeter fence and at each access point to deter trespassing. The signage will warn of trespassing, provide safety information, and provide contact details to report suspicious activity or request additional information. Local emergency responders will be provided access to all Facility entry points, via keys, knox boxes, or gate keypad codes.

The Facility may be unstaffed during normal operations. The Facility will not be accessible to the public; all visiting personnel must have authorization to enter the Facility and must complete site access documentation. Visitors should be escorted through the Facility by authorized personnel unless otherwise authorized by the Facility Manager. All visitors requiring unescorted entry must be familiar with site security and safety requirements. The Applicant will address the need for additional access controls as needed. Refer to Section 6(c)(1) of Appendix 6-1 for additional information regarding Facility access controls.

(2) Electronic Security and Surveillance Facilities

Electronic security and surveillance measures will deter unauthorized Facility access and will alert the Applicant to security breaches. The Facility collection substation and point of interconnection (POI) switchyard will be equipped with motion-controlled lighting, entry alarms, and video surveillance capabilities. See Section 6(b)(3) below for a discussion of security lighting. The Applicant will evaluate security threats and consider additional security measures to protect

vulnerable areas, if warranted. Refer to Section 6(c)(2) of Appendix 6-1 for additional information regarding Facility electronic security and surveillance measures.

(3) Security Lighting

Exterior Facility lighting will be limited to that which is required for health, safety, security, emergencies, and operational purposes and will be designed and installed to avoid off-site lighting effects. The Facility will not be lit during normal daytime operations. Motion-controlled lighting will be installed at the collection substation and POI switchyard to ensure site security during darkness. Additional motion-controlled lights may be added to vulnerable areas within the Facility, if deemed necessary. Task lighting may be installed at Facility access points, if deemed necessary for safety or security. Within the onsite collection substation and POI switchyard, manually operated task lighting will be installed in compliance with the National Electrical Safety Code; these lights will not be activated except during nighttime maintenance activities. Specifications for lighting are presented on Drawing No. FLCK-731 in Exhibit 5: *Design Drawings* and in Appendix 5-3: *Substation and Point of Interconnection Plans*.

In the rare case when Facility maintenance must occur during nighttime hours, temporary work lighting will be utilized. Temporary nighttime work lighting will be limited to those areas undergoing maintenance and will be directed away from off-site facilities and residences as much as possible. Temporary work lighting will be shut down when not in use, unless required for safety and/or security purposes.

Refer to Section 6(c)(3) of Appendix 6-1 for additional information regarding Facility security lighting.

(4) Lighting of Facility Components to Ensure Aircraft Safety

Components greater than 200 feet in height are not proposed for the Facility; therefore, aircraft obstruction lighting is not applicable, and the Facility will not compromise aircraft safety. Refer to Exhibit 16: *Effect on Transportation*, for information regarding transportation impacts, including aircraft.

(5) Cyber Security Program

A comprehensive cyber security program will be implemented for the protection of digital computer systems, communication systems, and networks that support the Facility. Section 6(d) of the SPP (Appendix 6-1) describes the cyber security program to be implemented, including procedures for network security, malware prevention, removable media controls, secure configurations, user education and awareness, management of user privileges, incident management, and monitoring. As described in Section 6(d) of the SSP, access to cyber infrastructure will be restricted and only authorized personnel will have access to Facility cyber infrastructure as appropriate to their role at the Facility. The Facility's cyber security program will comply with all North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection standards applicable to the Facility and will maintain an audit-ready Internal Compliance Program. Periodic validation of compliance with the applicable cyber security standards by an independent auditor will be carried out as required by 16 NYCRR §1100-2.7(b)(5). Refer to Section 6(d) of Appendix 6-1 for a complete description of the cyber security program and cyber security policies.

1(c) Safety Response Plan

The Applicant has prepared a SRP to ensure the safety and security of the Facility, its employees, and the public. The SRP, provided as Appendix 6-2, evaluates potential emergency scenarios, describes the roles of Facility personnel in preventing and responding to emergencies, and outlines policies and practices for ensuring safe construction, operation, and decommissioning of the Facility. The SRP lists onsite equipment and systems available to aid in the prevention of and response to emergency incidents. The SRP identifies local first responders and Facility contacts to serve as a quick reference should an emergency occur (see Appendix B (Local Public Safety Agencies and Emergency Service Providers) of Appendix 6-2). As noted above in Section 6(b), the Applicant met with representatives from the following fire departments on April 17, 2024 at the Town of Canajoharie Fire Hall:

- Rural Grove Fire Department;
- Ames Fire Department; and
- Canajoharie Fire Department.

During this in-person meeting, the Applicant presented the preliminary Site Layout showing access road locations and Facility components. The Applicant walked through the main components of the Facility and provided draft hard copies of the SRP for discussion of the key components and measures for safety and emergency response. Some key feedback received during the meeting from local fire departments, which has been incorporated by the Applicant, includes inclusion of knox boxes for access at gates, road widths, weight considerations, and turning radii for fire safety vehicles, vegetative maintenance around the fence line to act as a fire barrier, and methods of obtaining water in the fire vehicles (i.e., confirming that water access points are not closed off or unavailable). The Applicant will continue to meet with the local fire departments and emergency responders as the design is finalized to discuss additional measures as proposed on the Design Plans in Appendix 5-1.

The SRP will be updated by the Applicant periodically and will be enforced amongst all Facility employees and contractors. Key initiatives of the SRP are described below, in accordance with 16 NYCRR §1100-2.7(c)(1) – (7).

(1) Emergency Contingencies

Contingencies that would constitute a safety or security emergency are described in the SRP. Emergency contingencies identified include, but are not limited to, fire, electrical fire, medical crisis, petroleum or other chemical release, sabotage, bomb or shooting threat, chemical or biological threat, and severe weather such as thunderstorms and tornadoes. Contingency details are included in the SRP in Appendix 6-2, Section 6(d).

(2) Emergency Response Measures

Emergency response measures specific to each contingency are described in the SRP. The General Emergency Response Protocol for Facility personnel is described below.

In the event of an emergency during Facility construction, operation, or decommissioning, the following procedures shall be followed by on-site Facility personnel:

1. Stop work.

2. Notify the nearest supervisor or Facility representative (Facility Manager, Construction Supervisor, Safety Coordinator, On-Site Crew Leader, etc.). Provide the following information:
    a. Personnel name
    b. The location of the emergency (nearest panel array, structure, road junction, or other landmark)
    c. Name of any ill or injured person, if applicable
    d. A brief description of the emergency, including context, symptoms, severity of injury or illness, and type of injury or illness, if applicable
    e. Potential risks to others at or near the Facility
3. If a supervisor or Facility representative cannot be reached, or if the emergency poses an immediate threat to life or safety, dial 9-1-1.

Supervisors or Facility representatives notified of an emergency shall follow the following procedures:

1. Upon learning of an emergency, dial 9-1-1, if appropriate.
2. Notify on-site personnel, including any visitors, of the emergency via an alarm system, telephone, two-way radio, or siren.
3. If other personnel or visitors are at risk, evacuate the immediate area or the entire Facility Site.
4. For non-urgent injuries or health incidents, coordinate the transportation of the person to the nearest medical facility and notify the facility of the incoming patient.
5. Designate an employee to meet emergency services at the nearest Facility access point, if applicable, and escort them to the location of the emergency.
6. Designate one supervisor to accompany injured personnel to the hospital. The supervisor must remain at the hospital until all examinations (including drug and alcohol testing) are complete, such that a complete incident report may be produced.

For emergency response procedures specific to each contingency, please refer to the SRP in Appendix 6-2, Section 6(d).

(3) Evacuation Control Measures

The SRP describes evacuation control measures for each contingency. Designated evacuation routes and meeting locations will be identified in the final SRP after coordination with local emergency services and authorities. When instructed, personnel will evacuate the Facility via the Facility access roads and shelter at the designated meeting location. If personnel are unable to evacuate, they shall shelter-in-place and contact their supervisor for further instructions. As part of the annual training described in Section 6(c)(7) below, annual evacuation drills will be performed at the Facility to prepare for efficient evacuation in the event of an emergency. Evacuation procedures will be discussed during safety orientations and should be discussed periodically at safety meetings. Facility evacuation routes, meeting locations, and procedures shall be communicated to Facility personnel. For additional information regarding Facility evacuation, please refer to the SRP in Appendix 6-2, Sections 6(b)(4) and 6(d)(7). For evacuation procedures specific to each contingency, please refer to the SRP in Appendix 6-2, Section 6(d).

(4) Community Notification Procedures

The SRP describes community notification procedures for each contingency. For most emergency scenarios, due to the localized nature of the potential emergency, it is not expected that immediate emergency notification of the public will be necessary. When immediate community notification is required, Facility personnel will coordinate with emergency services and local authorities to disseminate pertinent information. For additional information regarding community notification procedures, please see the SRP in Appendix 6-2.

(5) On-Site Fire and Hazardous Substance Equipment and Systems

Equipment and systems will be available throughout the Facility to prevent and mitigate fire and chemical emergencies in accordance with the fire code of the New York State Uniform Fire Prevention and Building Code adopted pursuant to Article 18 of the Executive Law. As described in the SRP, on-site equipment available for use during fire and chemical emergencies will include, but is not limited to:

- Fire extinguishers, including those rated for electrical fires
- Grounding stick
- 11 and 40 cal Arc-Flash suits

- High voltage and heat-resistant gloves
- Tic-tracers
- Absorbent tubes
- Absorbent pads
- Absorbent material (sand, salt, etc.)
- Personal protective equipment (PPE)
- First aid kits

Chemical spills and other emergencies may require the services of an Emergency Response Contractor to quickly mobilize materials and equipment. The Applicant will coordinate with contractors to provide emergency services and equipment in the event of spills, releases, or other such emergencies.

For additional information regarding on-site emergency equipment and systems, please see the SRP in Appendix 6-2, Section 6(b)(2).

(6) Fire Emergency or Hazardous Substance Incident Contingency Plans

Based on the design of the Facility and infrastructure proposed, the potential for fire or hazardous substance emergencies is considered to be low. The risk of fire at the Facility is limited to potential grass fires due to lightning, failure of electrical lines, failure of the inverters and/or transformers, or sparks from cutting operations and vehicular operation over dry vegetated areas. Hazardous materials which may be used during construction and operation are limited to commonly used products such as fuel, lubricants, solvents, oils, chemicals, and paints. Public hazards from these materials, which may be kept onsite in relatively small volumes during construction or maintenance, would be limited primarily to potential spills, improper storage or transport of materials, or improper disposal of waste. These potential risks will be mitigated through implementation of robust safety response and environmental management plans and will not pose a major threat to public health or safety. However, out of an abundance of caution, contingency plans have been developed for implementation in the event of a fire emergency or hazardous substance incident. For specific information detailing fire and hazardous substance contingency plans, please see Appendix 6-2. Hazardous substances will also be addressed in the Spill Prevention, Control, and Countermeasure Plan (SPCC).

(7) Emergency Response Training and Drills

A pivotal component of emergency preparedness is training. The goal of emergency response training is to ensure that personnel can safely avoid hazardous conditions, prevent emergencies, and respond to emergencies. Several measures will be established to ensure a successful safety training program at the Facility. These policies are described in detail in Appendix 6-2, Section 6(b)(5).

During Facility operation, safety and emergency training drills, such as fire drills and evacuation drills, will be conducted annually in coordination with local emergency service providers and agencies. Local emergency service providers including those listed in the SRP will be encouraged to attend. These drills will familiarize employees with emergency procedures and assist safety coordinators in identifying potential vulnerabilities or areas for improvement. As part of the annual training, the Applicant will solicit and consider local emergency responder input and will update the SRP as appropriate based on such input.

For additional information regarding safety training, please see the SRP in Appendix 6-2, Section 6(b)(5).

1(d) Coordination with New York State Division of Homeland Security and Emergency Services

On May 20, 2024, the Applicant provided a copy of the safety and security plans in part (b) and (c) of this Exhibit to the New York State Division of Homeland Security and Emergency Services, requesting review and comment. As of the date of this Application, no comments have been received.

1(e) Plans Provided to Local Office of Emergency Management for Cities with a Population Over One Million

The Facility is located entirely within the Towns of Root and Canajoharie, Montgomery County, NY. The Facility is not located within any part of a city with a population over one million. Therefore, safety and security plans in part (b) and (c) of this Exhibit are not required to be provided to or be reviewed by the local office of emergency management.

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