EAST POINT ENERGY CENTER

Case No. 17-F-0599

1001.18 Exhibit 18

Safety and Security

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Exhibit 18: Safety and Security

This Exhibit will track the requirements of proposed Stipulation 18, dated August 20, 2019, and therefore, the requirements of 16 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. Safety and security risks are anticipated to be minimal during both construction and operation of the Project, as they have been on other NextEra renewable energy projects. Having experience on more than 2,000 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 a role model 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 to 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 to educate employees on safety risks and share best practices for risk mitigation.
- Employee observation programs identify injury 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.
- Train employees 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.
- Train employees 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 Area uses several security systems designed to prevent access from the general public. These systems complement the policies, procedures, and measures that form the Project's security program. During the construction phase, access roads may have temporary gates or signs installed, if determined to be necessary, to control public access to the Facility for safety reasons. Gates shall be secured after-hours of operations. Access controls to the Project during the construction phase include fencing and locking gates. Fencing will be provided around laydown and storage areas during construction, and gates will include a drop rod and latch closure with a locking mechanism attached. See sheet C-105 of Appendix 11-1, Preliminary Design Drawings, for details on fencing and gates. The Applicant has entered into lease and/or purchase option agreements with landowners, which provides the expectations for both parties relative to accessing each Project parcel during construction.

(2) Electronic Security and Surveillance Facilities

Electronic security and surveillance facilities are not proposed for the Project during construction. Should the Applicant determine a need, appropriate systems will be established to ensure appropriate monitoring and surveillance of the Project.

(3) Security lighting

Manually-controlled exterior lighting will be strategically placed as needed within the Project Area during construction to emphasize and highlight perimeters, gates, and vehicle gate openings. However, the majority of construction activities are planned to occur during daylight hours. Exterior lighting will be strategically placed around the substation and switchyard to emphasize worker safety while eliminating light trespass on to adjacent properties. No security lighting is proposed for the site during non-construction work hours. Security lighting will be used at the minimum levels needed to accomplish its purpose and will be used only when necessary. This will minimize any visual disturbances while providing adequate security for the Project.

(4) Setback considerations

Setbacks have been determined through multiple factors including but not limited to manufacturer recommendations, company standards, noise, the Town of Sharon's solar ordinance, environmental factors, etc. The selected setback distances conform to the substantive requirements of the Town of Sharon's code and were determined to provide for the health and safety of area residents. See Table 31-1 in Exhibit 31 for a summary of setbacks as they apply to the Project.

(5) Employee observation programs

Employee observation programs identify injury risks in the field, leading to focused injury prevention countermeasures. As mentioned above, NextEra employees and contractors are trained in "Peer-to-Peer" coaching to successfully address unsafe behaviors before an injury event or near miss occurs. Active Identification of near miss safety instances are important in the "Peer-to-Peer" coaching and future safety risk identification. For example, in one instance, sensitive equipment was very close to being hit by a reversing truck. Though this is an example of a near miss and no equipment or personnel were injured in this example, awareness and management of this safety risk was then implemented to avoid these risks in the future. Employees then mitigated this safety risk by inspecting the area around their vehicles and/or

heavy machinery prior to operation. Constant awareness and observation of safety risks are important to ensuring a safe workplace.

(6) Measures to ensure safety and security during construction

Contractors will comply with Occupational Safety and Health Administration (OSHA) regulations, in addition to state worker safety regulations, regarding electricity and other hazards, during construction of the Project. To minimize safety risks to construction personnel, all workers will be required to adhere to a safety compliance program.

The general public will not be allowed on the construction site. After hours, vehicular access to such sites may be blocked by parked equipment, and temporary construction fencing or other visible barriers, and suitable protection will be placed around excavations that remain open during off hours.

(7) Communication with stakeholders

The Applicant has been in consultation with emergency response providers and once selected, the general contractor will continue to coordinate with local fire and emergency personnel to assure that they are aware of where various construction activities are occurring and avoid potential conflicts between construction activity and the provision of emergency services. There is currently an absence of an active fire chief in the Town of Sharon, and, as of the time of the Application filing no one was available in that capacity to consult with the Applicant on its proposed Emergency Response Plan. The Applicant will continue its outreach in order to obtain input for a final Emergency Response Plan (ERP) that will be filed with any required Compliance Filing.

The Applicant will continue to consult with the stakeholders as necessary during construction to help minimize impacts to the general public and maximize safety of both the public and the construction staff. Prior to the start of construction, public notice of construction will be provided that includes contact information for the Applicant's construction supervisor and information about the Complaint Resolution Plan.

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

(1) Access controls

Fencing is the first layer of security at the Project Area. The 8.5-foot-tall security fence surrounding the solar panel arrays and the interconnection facilities will be the only permanent fencing

associated with the Project. This fence complies with the Town's 8-foot fencing height requirement in its Solar Law. The gates for all fenced facilities will remain locked whenever these facilities are unattended. Gates are outfitted with a "Knox Box" type locking system to allow Project access by emergency personnel. As described further below, there are not expected to be additional access controls for access points.

Trespassing and safety signage will be posted at gated access points as well as incrementally along the fenced perimeter and should be adhered to. The Applicant will address the need for further access controls on an as-needed basis.

(2) Electronic security and surveillance facilities

Electronic security and surveillance is not proposed for the Project. Should the Applicant determine a need, systems will be established to ensure appropriate monitoring and surveillance of the Facility. Factors that may trigger the need to install surveillance facilities include but are not limited to: attempted access by unauthorized personnel, civil disturbances or vandalism, and/or if there is an increased risk of safety or security concerns related to actions by unauthorized personnel. Because these actions are typically very isolated and infrequent, the Applicant does not expect there to be a need for electronic security and surveillance facilities.

(3) Security lighting

Manually-operated exterior lighting will be used as necessary for the Project during operation. Security lighting is proposed only at the collection substation and switchyard. Exterior lighting will be strategically placed around the substation and switchyard to emphasize worker safety while eliminating light trespass on to adjacent properties. See Appendix 11-1, Preliminary Design Drawings, which includes a detailed lighting plan with specifications for lighting. Security lighting used will be the minimum levels needed to accomplish the purpose and will not be used when unnecessary. This will minimize any visual disturbances while providing adequate security for the Project.

(4) Lighting of Facility Components to Ensure Aircraft Safety

As the Project does not involve Components greater than 200 feet in height, avian obstruction lighting is not applicable to the Project nor will aircraft safety be compromised.

(5) Setback Considerations

Setbacks have been determined through multiple factors including but not limited to manufacturer recommendations, company standards, noise, the Town of Sharon solar ordinance, and environmental factors. The selected setback distances were determined to ensure the health and safety of all area residents. See Table 31-1 in Exhibit 31 for a summary of setbacks as they apply to the Project. The selected setbacks conform with the Town of Sharon's substantive requirements.

(6) 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 regards 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 continuously 24/7 by a Security Operations Center. NextEra employees are required to complete training in information security awareness.

18(c) Emergency Response Plan

NextEra 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.

(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. Below are general emergencies 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 Project equipment from adverse damages.
- In the event of an emergency where personnel should be protected, call 911 immediately, and then contact NextEra's Fleet Performance and Diagnostics Center (FPDC, aka, 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 facility 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 should monitor weather-related emergencies. Information and warnings are available via local radio, television, and internet weather and news sites and via FPDC.

- 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 site should be shut down due to the weather situation. When severe weather is forecast 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 Site's operating practices and plans that ensure safety considerations first.
- The following list represents actions that should be taken at the Site for it to be secured. The listing is not intended to be all inclusive and will vary in applicability pending advance warning of the on-set of the event.
    - Evacuate open areas where solar racking or other conductive materials are located if lightning is in the area, or if there are other unsafe conditions that warrant construction activities to be unsafe.
    - Ensure Site personnel are safe and accounted for.
    - Seek safe shelter. If in your vehicle in winter, ensure survival kit and enough gas is in place.
    - Ensure portable equipment, trash cans, tools, etc. are stored indoors.
    - Ensure that construction trailers and storage containers are closed and latched.

Fire

There is a very low likelihood that a fire would occur at a PV solar facility. The solar field itself has no substantial fuel source to support a fire - the panels are primarily metal and glass. Vegetation grown within and under solar arrays will consist of grasses that are maintained less than 2-3 feet in height. The inverter units and pad mounted transformers contain no hazardous materials (the inverters are anticipated to be air-cooled and transformers typically only 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.

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 Management Practice (BMP) to prevent fires is to maintain excellent housekeeping. Any accumulation of combustible material should be reported during the daily

meeting or the monthly Project Area inspection. In addition to the general emergency response measures listed above, contingency-specific measures include:

- Any person 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 person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. 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 person discovering the fire should use 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.
- All Project personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the Facility.
- In response to the fire, the Site Leader will need to determine if equipment needs to be shut down and activity 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 or off-site, d) any known injuries, e) any other pertinent information.
- Site personnel shall escort emergency service to the location of the fire. Site personnel may also be called on to provide emergency services with specific information about the dangers of Project equipment, chemicals nearby, electrical sources, fuel storage and supply, etc.

Physical Security

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 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 communications, 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 other), 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 at (561) 691-5000, 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, FPDC, 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:

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

    - 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 vulnerability that caused 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 (HTF) 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 Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared and 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 or oil/HTF 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 has occurred to personnel, 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 (water bodies, streams, ground, roadways).

- 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 Number
National Response Center	**2 to 4 Hours**	**1-800-424-8802**
New York State Spill Hotline	**Up to 2 Hours**	**1-800-457-7362**
NYSDEC Region 4	**2 to 4 Hours**	**518-357-2075**
New York State Emergency Response Commission (SERC)	**2 to 4 hours**	**518-292-2366**
U.S. EPA Region 2	**2 to 4 hours**	**1-877-251-4575**
Safety Kleen	**2 to 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 boundaries of the spill, and place absorbent mats over any drains that are near the location of the spill.
- 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/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 will be 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).

The Project will maintain at least one well-stocked first aid kit at the construction trailer and one in each Project vehicle. These 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 locations 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 at a designated location known and accessible to 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. 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 noticed, attempt to remove the blockage
- If no signs of breathing continue, commence CPR;

    - Administer compressions that are at least 2 inches deep and delivered at a rate of 100 compressions per minute.
    - Deliver two rescue breaths, then continue compressions.
- 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 AED instructions to ensure 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 injured parts of the victim; and/or
- Prepare 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 and more 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 handheld radios;
- Determine the safest muster area to proceed to, depending upon the known circumstances of the emergency. The Project Area will have an identified off-site muster area;
- Assign designated Project Area employees to assist any employees, visitors, or contractors with special needs that would restrict their ability to get safely and expediently to the muster area;
- Pass the following information over the Project Area 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 contractors and visitors; and
- 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 necessary operating actions to place the facility 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 FPDC of the current facility status, and evacuation details;
- Perform a controlled shutdown in accordance with appropriate procedures and directions;
- Once the shutdown has been completed, all essential personnel shall gather at the designated muster area and take roll call; and
- When all essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel.

(4) Community Notification Procedures by Contingency

Community notification in the event of any emergency begins by calling 911 and contacting local emergency responders. If necessary, a Project representative will contact landowners directly by telephone and/or by 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.

The ERP and the Health and Safety Plan for the Project will be shared with the local emergency response teams. Local emergency response teams will be given an opportunity to review these plans, ask questions, and provide suggestions. The Applicant understands the importance of coordination with local fire, police, and other emergency services. The Applicant will work to ensure local emergency response teams are kept updated on the status of the Project and are made aware of potential safety and security emergencies. Preliminary introductions and discussions have been conducted with local fire and police as described in the PIP 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 NYS Division of Homeland Security and Emergency Services

The Applicant will provide 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 and will also request that it review and provide comments on the ERP. The Applicant will provide documentation of this correspondence to the Department of Public Service staff once available.

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

This Facility 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;
- Spill containment units at the construction trailer and at pre-determined sites across the Project;
- Emergency eye wash stations at the construction trailer;
- Wall-mounted first aid kits at the construction trailer;
- Portable first aid kits and eyewash bottles;
- Portable fire extinguishers;
- 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 or a Hazardous Substance Incident

Emergency response plans for a fire emergency and for a hazardous substance incident/spill are summarized in Exhibit 18(c)(4) above and are explained in detail in the ERP.

In addition, a SWPPP has been prepared 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 the construction, operation, or maintenance of the Facility. The SWPPP includes protocols to be followed in the event of minor and major hazardous substance discharge events, as well as a Facility-wide inventory of spill response equipment. The majority of potentially hazardous substances on-site consist of various oils such as hydraulic oil, mineral oil, and lubricating oil. See Exhibit 23 for additional information on the Preliminary SWPPP. A SPCC plan will be completed upon receipt of the Certificate and submitted as part of any required Compliance Filing for approval prior to construction/operation of the Project

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

The Applicant has sought to consult with local emergency responder in the Town but, as noted above, there is currently a vacancy for that position. The Applicant will continue its outreach and when the vacancy is filled, will provide 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 request that they review the plans and will give them an opportunity to provide comments and ask questions. The Applicant will review responses received from local emergency first responders and adjust the plans if warranted. As noted above, the final ERP will be included in any required Compliance Filing.

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. When the appropriate official fills the

position, the Applicant will provide 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 request that they review the plans and will give them an opportunity to provide comments and ask questions. The Applicant will review all responses received from local emergency first responders and adjust the plans if warranted.

18(j) Local Emergency Response Organization Training

Information and training will be provided to local emergency response organizations, including Sharon Springs Fire Department and Sharon Springs Rescue Squad, to provide instruction on how to respond to emergencies that occur on or near Facility Components. The Applicant will work with the emergency response organizations listed above, 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. 2019. CPR Steps. Accessed May 2019. Available online at: https://www.redcross.org/take-a-class/cpr/performing-cpr/cpr-steps