Mohawk Solar

Case No. 17-F-0182

1001.18 Exhibit 18

Safety and Security

EXHIBIT 18 SAFETY AND SECURITY

Safety and security are critical components of the construction and operation of any major electrical generation facility. However, overall safety and security risks associated with the Facility are anticipated to be minimal. To ensure the safety of construction and operations personnel, as well as the security of the Facility, the Applicant has developed, and will implement plans for site security, health and safety, and emergency action, which are described below and are based on the Applicant's experience in addressing safety and security issues at other solar projects. The Applicant has coordinated with the County emergency department, local first responders, and the New York State Division of Homeland Security and Emergency Services to ensure appropriate actions are taken in the event of an emergency.

(a) Preliminary Plans for Site Security During Facility Construction

To reduce safety and security concerns during construction, public access to the Facility will be limited. The contractor will be required to provide a site security plan for Facility construction, which will be developed by the contractor selected to lead the construction of the Facility (i.e., the Balance of Plant [BOP] contractor) prior to construction of the Facility. However, the Applicant has prepared a Preliminary Health and Safety Plan (Appendix 18-A to this Application), which includes measures to be implemented during Facility construction to ensure security.

(1) Access Controls

Typical safety and security plans call for restricting public access to the site during construction by locked gates and signage. With respect to the Facility, the general public will not be allowed on the site during construction. After hours, vehicular access to such sites will be blocked by parked equipment or temporary fencing. Temporary construction fencing or other visible barriers will be placed around excavations that remain open during off hours.

To prevent members of the public or unauthorized personnel from entering the Facility, each work area will be clearly identified using signs and/or restricted via physical barriers. Additionally, a log of all personnel visiting, entering, or working on the site will be maintained by the Plant Manager and/or Operations & Maintenance (O&M) Manager. Visitor access will require Plant Manager and/or O&M Manager or Project Manager approval. Following approval, visitors will be required to attend site orientation/safety training provided by the Plant/O&M Manager or Project Manager.

(2) Electronic Security and Surveillance Facilities

Trespassing is generally not an issue during construction and operation of solar facilities. Therefore, electronic security and surveillance is not currently proposed for the Facility. However, if problems arise, video cameras or other surveillance technology may be set up to monitor activity.

(3) Security Lighting

Security lighting will be used around staging areas and office trailers during construction. Lighting will be directed downward where possible to minimize the effects of light pollution and will be reduced to the maximum extent practicable to minimize potential wildlife attraction. Where possible, motion-sensing lights will be used at all fenced staging areas to minimize impact. Any construction yard lighting will typically be LED flood lights mounted on independent fiberglass light poles and on any available steel structures like shield masts or transmission dead-end structures. A 30-degree tilt angle will be utilized to minimize light trespass. A lighting plan for the substation is provided in the substation details (Appendix 5-F) and a lighting plan for the O&M building is provided in the O&M building details (Appendix 11-D).

Construction that takes place outside of daylight hours will include the lighting necessary to allow for safe construction activities while at the same time reducing off-site light pollution to the maximum extent practicable. This temporary lighting will be strategically placed to minimize impact and will be turned off when not in use. These lights are typically powered by portable generators and are only run and lit while crews are working.

A detailed Facility Exterior Lighting Plan (Lighting Plan) will be submitted as a compliance filing for review and approval no later than 30 days prior to the commencement of construction. The elements to be addressed in the Lighting Plan include but are not limited to the use of task lighting and full cut-off fixtures.

(4) See Exhibit 12 for a detailed discussion of Facility setbacks. These setbacks, in association with the access controls discussed in Section (a)(1) and periodic security measure inspections, should ensure adequate safety and security during construction of the Facility.

(b) Preliminary Plans for Site Security During Facility Operation

It is anticipated that the Applicant will own and operate the Facility. Therefore, the Applicant will be responsible for site safety and security during operation and preparation of the associated plan. The Applicant has developed a Preliminary Site Security Plan for Facility Operation, which includes the following measures to be implemented during Facility operation (Appendix18-B).

(1) Access Controls

All access roads will have gates that are kept locked to restrict access to the general public. Signs will be installed on gates warning the public not to trespass. If unauthorized access becomes a reoccurring problem (i.e., multiple incidents a month), or gates are found to be damaged, the Applicant will assess whether to install intrusion detection devices at the entrance of Facility access roads.

All PV arrays and inverters will also be fenced, gated, and locked at all times. In addition, the collection substation will be fenced. Control buildings within the substation and the fence door will be kept locked unless authorized personnel are inside the substation. The access road entrance to the substation will be gated and kept locked in a similar manner to the PV array access roads.

(2) Electronic Security and Surveillance Facilities

The collection substation and the O&M building will have alarm systems and/or video recording in place. No other electronic security is currently proposed for the Facility. However, intrusion detection can be added to access road gates and solar arrays if such measures are determined to be necessary during Facility operation.

(3) Security Lighting

Security lighting will be installed at the collection substation and the O&M building. Security lighting that fails will be promptly replaced and maintenance inspections of the collection substation will include checking site security lighting. A summary of the security lighting for the collection substation and the O&M building is included in the Preliminary Site Security Plan (in Appendix 18-B).

A detailed Facility Exterior Lighting Plan (Lighting Plan) will be submitted as a compliance filing for review and approval no later than 30 days prior to the commencement of construction. The elements to be addressed in the Lighting Plan include but are not limited to the use of task lighting and full cut-off fixtures.

(4) Aircraft Safety Lighting

Given the low profile of solar generating facilities, aircraft safety lighting is not required. As such, it is not discussed in this Application.

(5) Setback Considerations

See Exhibit 12 for a detailed discussion of Facility setbacks. These setbacks, in association with the access controls discussed in Section (b)(1) and security lighting discussed in Section (b)(3), should ensure adequate safety and security during operation of the Facility.

(6) Cyber Security Program

The Applicant will partner with an industry leader in cyber security that is compliant with the current standards issued by a standard setting body generally recognized in the information technology industry (e.g., the National Institute of Standards and Technology, etc.) and will provide continuous (i.e., 24 hours/day, 365 days/year) monitoring and alerting for all servers, workstations, and firewalls. Multi-point tiered threat detection will be employed. Cyber monitoring includes all cyber assets at the site.

(c) Preliminary Safety Response Plan

A Preliminary Emergency Action Plan (EAP) has been developed by the Applicant and is included as Appendix 18-C to this Application. The information contained in the EAP was developed in conjunction with local emergency service providers and will be made available to the employees of the BOP and all subcontractors or authorized visitors to the Facility Site, including workers. The EAP outlines the procedures to follow in the event of an emergency. In addition to identifying specific emergencies that could arise at the Facility, the EAP, also provides awareness to the following:

- Identify alarm and emergency evacuation procedures;
- Identify procedures to be followed by site personnel who operate critical operations before they evacuate;
- Identify rescue and medical duties for all on-site personnel of Applicant, the BOP and its subcontractors following emergency evacuation;
- Identify persons who can be contacted for further information or explanation of duties under this plan; and
- Establish training guidelines for site personnel regarding this plan to support safe practices in the event of an emergency.

Overall safety and security risks associated with the Facility are anticipated to be minimal. A discussion of the EAP elements is provided below.

(1) Identification of Contingencies that Would Constitute an Emergency

The Project poses little risk to the community. First, the Facility will not use fossil or nuclear fuels. Second, the Facility will be located in a rural area away from population centers. Finally, the setback requirements governing the location of equipment protect people and structures near the Project from potential harm in the event of an emergency. Accordingly, the EAP focuses primarily on supporting the safety of persons at the Facility in the event of an emergency. The EAP contains information regarding the following emergency situations:

1. Medical Emergency
2. Physical Security Threat
3. Fire
4. Earthquake
5. Electrical storms
6. Tornados
7. High winds
8. Hurricanes
9. Flooding
10. Snow storms

For each emergency category, the EAP contains procedures/guidelines to be followed in the event an emergency arises, together with information that identifies key tasks and specifies who is required to complete the task. In addition, the EAP contains a description of the hazardous equipment that will be located on site and the measures that will be taken by the Applicant in the event of an emergency.

(2) Emergency Response Measures by Contingency

As previously noted, in the event an emergency response measure is necessary, the Preliminary EAP provides detailed instructions and procedures/guidelines to be followed by site personnel, the public, and emergency responders for each of the above listed contingencies. See Appendix 18-C for a description of the emergency response measures by contingency.

(3) Evacuation Control Measures by Contingency

Unlike a nuclear facility or a natural gas facility, a solar power project does not create safety concerns of a magnitude that would necessitate an evacuation. Therefore, Facility-related operations are not anticipated to require evacuation. However, in the event an evacuation is necessary, the EAP provides detailed instructions to

Mohawk-affiliated workers, the general public, and emergency responders relative to each of the contingencies identified in Section (c)(1), as applicable (see Appendix 18-C).

(4) Community Notification Procedures by Contingency

A solar project does not create safety concerns that would typically require community notification. As detailed in Section (c)(1), the primary contingencies considered would be internal to the Facility (e.g., medical emergencies, physical security threats, and fire). Local first responders/emergency services will be notified of all emergencies for which their assistance is or may be required. The criteria for determining whether to contact local emergency responders are spelled out in the EAP for each contingency.

While solar facilities typically do not create safety concerns that would require community notification, the EAP does provide an emergency number for the community to report emergency situations. The number below is for the use of first responders, state personnel, or members of the public to report emergency situations that may need attention.

National Control Center in Portland, Oregon: 1-866-351-5657

In addition to direct outreach to emergency responders via 911, the Applicant's Plant Manager and/or O&M Manager will assess each emergency to determine whether outreach to the community generally and/or to host and adjacent landowners may potentially be required and make contact with those entities as appropriate. The Plant Manager and/or O&M Manager will decide whether reporting is necessary and will notify community officials and/or landowners of the emergency via telephone as appropriate. Reports of any emergency incident requiring immediate outreach to federal, State and/or local authorities will be made by the Plant Manager and/or O&M Manager.

(d) Provision of Security and Safety Plans to NYS Division of Homeland Security

The Preliminary Site Security Plan (Appendix 18-B) and EAP (Appendix 18-C) were provided to the New York State Division of Homeland Security on March 13, 2019. To date, the Applicant has not received a response from the New York State Division of Homeland Security.

(e) Provision of Security and Safety Plans to Local Office of Emergency Management

The Facility Site is not located within any part of a city that has a population over one million. As a result, a review by the local office of emergency management is not required by the Article 10 regulations. However, the Applicant has

coordinated with the Montgomery County Emergency Services Department and provided them with a copy of the EAP. To date, the Applicant has not received a response from the Montgomery County Emergency Services Department.

(f) Onsite Equipment to Respond to Fire Emergencies or Hazardous Substance Incidences

The EAP will include a detailed list of all equipment available for responding to fire emergencies or hazardous substance incidences. In general, the Applicant will provide fire extinguishers, automated external defibrillators (AEDs), and first aid kits at the O&M building and collection substation.

Emergency responders may not have direct access to solar panels or the collection substation through access roads due to security concerns. However, any time that the facility operators and maintenance personnel are at the Facility Site or substation, the access road gates remain unlocked, so medical personnel will be able to access the PV panels and collection substation when personnel are at these locations.

(g) Contingency Plans for Fire Emergencies or Hazardous Substance Incidences

The EAP contains a protocol and guidelines to be followed in the event of a fire emergency. In addition, drills with emergency responders will occur at least once a year. Drill activities will be jointly decided between site management and emergency responders. In addition, a Spill Prevention, Control and Countermeasure (SPCC) has been prepared, and will be implemented, for both the construction and operation phases of the Facility. The SPCC Plan provides an assessment of potential hazardous substances that could be utilized during the construction, operation or maintenance of the Facility. Typically, potential hazardous substances would consist of oils such as fuel oil, hydraulic oil, mineral oil, and lubricating oil (see Exhibit 23 and Appendix 23-C for additional information).

A fire at the Facility's collection substation will be contained through a combination of a proposed gravel pad and an access road around the substation. As a preliminary matter, the gravel pad underlying the substation will contain fire should it occur. Moreover, the access road, which consists of gravel and compacted stone, provides a buffer between the substation and the surrounding properties to help prevent the spread of fire. Finally, the substation will be constructed with either an above grade feature (earthen berm or concrete pit), or a below grade secondary containment system (loose stone and/or a geomembrane liner), which will provide further containment in the event of a fire.

(h) Provision of Security and Safety Plans to Local Emergency First Responders

The EAP, as described above, has been provided to the local emergency first responders that serve the Facility. To date, the Applicant has not received a response from the local emergency first responders.