ConnectGen Montgomery County LLC

Mill Point Solar I Project

Matter No. 23-00034

§ 900-2.7 Exhibit 6

Public Health, Safety, and Security

Revised August 2024

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Glossary List

Applicant:	ConnectGen Montgomery County LLC (ConnectGen), a direct subsidiary of ConnectGen LLC, is the entity seeking a siting permit for the Facility from the Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State (NYS) Executive Law.
Facility:	The proposed components to be constructed for the generation, collection and distribution of energy for the Project will include: photovoltaic (PV) solar modules and their rack/support systems; direct current (DC) and communications cables connecting the panels to inverters; the inverters, with their support platforms, control electronics, and step-up transformers; buried alternate current (AC) medium voltage collector circuits; fencing and gates around each array of modules; access roads; temporary laydown/construction support areas; a medium voltage-to-transmission voltage substation with associated equipment and fenced areas; a new 3-breaker ring bus point of interconnection switchyard (POI switchyard); two adjacent approximately 305 foot-long 345 kV transmission line segments to interconnect the new POI switchyard to the existing National Grid Marcy – New Scotland 345-kilovolt transmission line; and an operations and maintenance (O&M) building with parking/storage areas as well as any other improvements subject to ORES jurisdiction.
Facility Site:	The tax parcels proposed to host the Facility, which collectively totals 2,665.59 acres.
Point of Interconnection (POI) or POI Switchyard:	A new 3-breaker ring bus point of interconnection switchyard will be constructed adjacent to the existing National Grid Marcy – New Scotland 345-kilovolt transmission line; the substation will tie into the new POI switchyard via an overhead span and deliver power produced from the Facility onto the electric grid through two overhead spans tapping the National Grid-owned Marcy – New Scotland 345-kV transmission line. The POI switchyard is located off Ingersoll Road in the northeastern portion of the Facility Site.

Limits of Disturbance (LOD):	The proposed limits of clearing and disturbance for construction of all Facility components and ancillary features are mapped as the LOD. The LOD encompasses the outer bounds of where construction may occur for the Facility, including all areas of clearing, grading, and temporary or permanent ground disturbance. This boundary includes the footprint of all major Facility components, defined work corridors, security fencing, and proposed planting modules, and incorporates areas utilized by construction vehicles and/or personnel to construct the Facility.
Project or Mill Point Solar I	Collectively refers to permitting, construction, and operation of the Facility, as well as proposed environmental protection measures and other efforts proposed by the Applicant.
Study Area:	In accordance with the Section 94-c Regulations, 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 96,784.84 acres, inclusive of the 2,665.59-acre Facility Site.

Acronym List

AC	Alternating current
BMP	Best Management Practices
CLCPA	Climate Leadership and Community Protection Act
DC	Direct current
FEMA	Federal Emergency Management Agency
kV	Kilovolt
HDD	Horizontal Directional Drilling
LOD	Limits of Disturbance
NYCRR	New York Codes, Rules and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
O&M	Operations and maintenance
ORES	Office of Renewable Energy Siting
OSHA	Occupational Safety and Health Administration
POI	Point of Interconnection
PV	Photovoltaic
SEP	State Energy Plan
SPCC	Spill Prevention, Containment, and Control
SPDES	State Pollutant Discharge Elimination System
SRP	Safety Response Plan
SSP	Site Security Plan
SWPPP	Stormwater Pollution Prevention Plan
USACE	United States Army Corps of Engineers
USCs	Uniform Standards and Conditions

EXHIBIT 6 PUBLIC HEALTH, SAFETY, AND SECURITY

6(a) Avoidance and Minimization of Potential Adverse Impacts

The Applicant has designed the Facility to avoid and/or minimize potential adverse impacts on the environment, public health, and safety during both construction and operation of the Facility. The Applicant worked diligently during the pre-application study phase to evaluate public health, safety, and security aspects of the Facility Site and assess potential adverse effects of various construction and operation scenarios.

Solar-generated power is safer and healthier than most other forms of electricity generation. Unlike fossil fuel-fired power plants, solar facilities produce energy without emitting pollutants that affect air quality. In addition, solar facilities do not require water or discharge wastewater; therefore, they produce energy without affecting the availability or quality of surface water or groundwater. The lack of impacts to air and water resources is a major public health benefit.

According to New York State's (NYS) 2015 State Energy Plan (SEP) and the 2019 Climate Leadership and Community Protection Act (CLCPA), reducing greenhouse gas emissions from the energy sector is a critical element of protecting the health and welfare of the State's residents. Clean air is essential to public health and quality of life. NYS's existing energy system provides many economic and quality of life benefits; however, it's also identified as a significant contributor to impacts on the State's natural resources and public health, principally due to emissions that can influence air quality, some of which also find their way into waterbodies and other natural resources. The SEP determined that increasing the fraction of the State's electricity needs met by solar (and other renewable sources) will, in general, decrease health risks associated with electricity production. Additionally, as discussed in more detail in Revised Exhibit 17 (Consistency with Energy Planning Objectives), the State has committed to consuming 100% of its electricity from carbon-free resources such as solar energy by 2040 through adoption of the CLCPA. The Project supports near term public health and safety through the displacement of air and water emissions, but also meets long term objectives of curbing climate change which has broader public health and safety effects.

At the local level, the Applicant has developed and will implement a Site Security Plan (SSP) and Safety Response Plan (SRP) (Appendix 6-1 and Revised Appendix 6-2, respectively) to ensure that any immediate safety concerns at the Facility during construction and operation are addressed in a timely and effective manner. This includes coordination and training with the local

fire department(s) and emergency responders. The Applicant is committed to construct and operate the Facility in a safe and environmentally responsible manner and in accordance with applicable health and safety standards.

The following sections discuss, to the degree applicable to the Project, the consideration of specific public health and safety risks.

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

One of the advantages of solar electricity is that it does not produce gaseous, liquid, or significant solid waste during operation. With respect to construction, the generation of gaseous, liquid, and solid waste is primarily limited to standard operation of construction equipment and component deliveries that will be handled by the designated contractor in accordance with all applicable laws and regulations pertaining to such wastes. For disposal and recycling activities, the Fulton County Landfill and the Amsterdam Transfer Station facilities will be utilized.

Construction. Project construction will generate solid waste, primarily plastic, wood, cardboard, and metal packing/packaging materials, construction scrap, and general refuse. The majority of solid waste generated (approximately 30,000 cubic yards) includes the packing materials used to transport components to the Facility Site. Minor solid waste volumes include items from vehicle maintenance, general refuse from onsite workers, and mud from horiztonal directional drilling activities (HDD). The HDD process will generate approximately 15,000 gallons of drilling fluid (also known as HDD mud) which may be dried onsite or hauled off by the contractor. Approximately 25,000 wooden pallets will be returned to vendor for reuse as applicable, recycled, or disposed of at a landfill. Construction refuse will be disposed of in onsite dumpsters or recycled by the contractor. Approximately 10- to 40-yard roll off dumpsters will be selectively located within the Facility security fencing at locations such as laydown yards and active construction areas for proper waste management. In accordance with Section 5, Part 16 of the Town of Glen Solar Law (Town of Glen 2022; Appendix 24-1), waste and recyclable materials that are generated during construction will be contained in a covered dumpster and will be removed by a private contractor within 30 days of the generation of the waste or materials to be recycled. Defective panels and other components will be sent back to the manufacturer.

Clearing of vegetation may also result in solid waste for disposal. Locations of tree clearing are shown on Sheets MPS-C-101-01 through MPS-C-101-46 of the Design Drawings in Revised Appendix 5-1. The Facility will require vegetation and tree clearing (approximately 100.31 acres of trees). Tree clearing will occur to allow for placement of Facility solar arrays, inverters, access roads, and collection lines. Additionally, some tree clearing is required to prevent shading of the panels. Tree clearing has been limited to the minimum amount necessary for construction and operation of the Facility. Timber and vegetative waste will be handled in accordance with the clearing methods outlined in 19 New York Codes, Rules and Regulations (NYCRR) Section 900-6.4. A more detailed discussion on tree clearing is included in Exhibit 11, Section 11(b) and Revised Exhibit 24, Appendix 24-5. Timber from tree removal will be provided to landowners upon request, salvaged for merchantable timber, or disposed of at a landfill. Woody debris that has been chipped or mulched will be spread onsite in upland areas of the Facility Site and/or used for BMPs. Densely wooded areas may result in a volume of approximately 300 cubic yards of wood chips per dense tree stand acre, with an additional 100 cubic yards resulting from chipping of associated stumps totaling approximately 40,000 cubic yards for the Project. However, the majority of cleared vegetation is anticipated to be repurposed and utilized on-site or converted to merchantable lumber. Thus, vegetation clearing waste that would be unusable and disposed of at a licensed off-site landfill is anticipated to be negligible.

Vegetative clearing will occur at designated areas as indicated on the final construction drawings (to be prepared for the Facility following issuance of the Siting Permit and filed as a Compliance Filing). Due to the potential presence of occupied habitat for northern long-eared bats within the Facility Site, the Applicant plans to adhere to tree clearing limitations outlined in the Uniform Standards and Conditions (USC) (i.e., Section 900-6.4(o)(4)(iii)(c) and 900-6.4(o)(6)(i) and (iii)). It is currently anticipated that trees cleared from designated areas within the limits of disturbance (LOD) will be cut into logs and stockpiled on the edge of the work area or removed; limbs and brush may be chipped and spread over onsite upland areas (safely away from water resources) as to not interfere with existing land use practices.

To reduce impacts to existing land uses, branch/brush debris and tree stumps will be chipped in place, where necessary, and spread onsite to a maximum depth of three inches in upland areas. Wood chips will not be stored or disposed of in wetlands, within stream banks, delineated floodways, or active agricultural fields, so as not to interfere with existing land use practices. Wood that is chipped will be used as stabilization in accordance with the

Project's Stormwater Pollution Prevention Plan (SWPPP) in Revised Exhibit 13, Appendix 13-3 and any other regulatory requirements attached to this Project. In addition, construction materials, chemicals, debris, and waste shall be managed, handled, stored, and disposed of in accordance with the Project's SWPPP, Spill Prevention, Control, and Countermeasure (SPCC) Plan, and other applicable laws. Subject to landowner preference, the Applicant will coordinate with landowners to salvage merchantable logs and fuel wood. Where merchantable logs and fuel wood will not be removed from the Facility Site during clearing activities, final construction plans shall indicate locations of stockpiles to be established for removal or future landowner resource recovery.

Generation of gaseous and liquid waste will be limited to the operation and maintenance of construction equipment and vehicles during the construction phase. Construction equipment and vehicles will be fueled by unleaded gasoline and ultra-low sulfur diesel provided by temporary onsite aboveground storage tanks. Other waste will be limited to standard construction-related wastes and will be handled by the contractor in accordance with construction best management practices (BMPs) and all applicable laws and regulations.

Concrete will be required for the construction of the substation and switchyard pad; however, no concrete washout shall occur onsite. Since concrete trucks will conduct washout activities offsite, concrete washout stations will not be located within the Facility Site, preventing concrete waste from entering stormwater runoff, leaching into soils, or requiring removal.

During construction, sanitary facilities used by workers will consist of onsite portable toilets, which will be emptied and maintained by a contracted portable sanitation company on an as-needed basis with waste hauled to licensed offsite disposal facilities.

Operation. Operation of a solar energy facility generates minimal waste, consisting largely of cardboard packaging and vegetation from routine maintenance, such as the replacement of panels and emergency repairs of solar components. During operation, Facility components that are no longer operational and require replacement, such as inverters, transformers, and broken solar panels, will be repurposed if possible or recycled to the maximum extent practicable. As inverters average a 20-year lifespan, the Applicant anticipates replacing inverters once during the life of the Facility. During operation of the Facility, personnel vehicles will be fueled and maintained offsite; therefore, gaseous and liquid waste generation are not anticipated from personnel vehicles.

The Applicant has also prepared a Site Restoration and Decommissioning Plan (See Revised Exhibit 23, Appendix 23-1), which describes methods for removing and recycling or disposing of equipment and materials at the end of useful life of the Project.

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

No additional volume of waste beyond that addressed in Section 6(a)(1) above will be released to the environment by the Project during construction or operation.

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

No treatment processes to eliminate or minimize waste will be necessary as no additional volume of waste beyond that addressed in Section 6(a)(1) above will be released to the environment by the Project during construction or operation.

(4) Collection, Handling, Storage, Transport, and Disposal

Collection, handling, storage, transport, and disposal procedures are addressed in Section 6(a)(1) above.

(5) Study Area Maps and Analysis

Figure 6-1 shows the relation of the Facility Site and Study Area (area within a 5-mile buffer of the Facility Site boundary) to public water supply resources (to the extent locations are publicly available), community emergency response resources and facilities including police, fire and emergency medical response facilities, emergency communications facilities, hospitals and emergency medical facilities, existing known hazard risks including flood hazard zones, landslide susceptibility, explosive or flammable materials transportation or storage facilities, and contaminated sites. Storm surge zones, areas of coastal erosion hazard, landslide hazard areas, and areas of geologic, geomorphic, or hydrologic hazard are not applicable to the Project. As shown on Figure 6-1, none of these features are located in the Facility Site. Federal Emergency Management Agency (FEMA)-designated 100-year flood hazard areas are located adjacent to the Facility Site along State Route 5, but not within the Facility Site. According to Flood Insurance Rate Map panels 36057C0159E, effective date 1/19/2018; 36057C0166E, effective date 1/19/2018; 36057C0187E, effective date 1/19/2018; 36057C0190E, effective date 1/19/2018; 36057C170E, effective date 1/19/2018, the Facility Site is located within Zone X – an area of minimal flood hazard.

In accordance with Section 4 (A)(7) of the Town of Glen Solar Law (Town of Glen 2022; Appendix 24-1), all required areas of the Facility will be accessible for fire, emergency services, and police protection.

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

The development, construction, and operation of the Facility is not expected to result in significant adverse impacts on the environment, public health, or community safety. As indicated in Sections 6(a)(1)-(5) above, the Facility is not expected to result in any public health or safety impacts associated with gaseous, liquid, or solid wastes. Solar energy facilities do not directly require the use or storage of combustible fuels during operation. No short-term, long-term, or cumulative receptor impacts are anticipated. This includes issues surrounding audible sound (Exhibit 7, Section 7b), low frequency noise (Exhibit 7, Appendix 7-4), glare (Revised Exhibit 8, Appendix 8-2), and potable water (Revised Exhibit 13, Section 13(a)(3)).

(7) Proposed Minimization Measures

As discussed in Section 6(a)(6) above, impacts to public health and safety are not expected. However, general measures to minimize impacts from construction and operation of the Facility on the environment, public health, and safety include compliance with applicable substantive local, State, and/or federal regulations that govern Project construction and operation, as well as commitments made by the Applicant throughout the Application process and in the Siting Permit and USCs approved by the Office of Renewable Energy Siting (ORES). The Facility has also been designed in a manner to minimize potential impacts such as noise (Exhibit 7) and glare (Revised Exhibit 8). Additionally, the Applicant will provide annual emergency response training to local first responders and will maintain communication with those first responders so that clear roles and responsibilities are delineated regarding emergency response. See Section 6(c)(7) below for details. The Applicant sited the Facility to decrease potential impacts to public health and safety by including setbacks from neighboring parcels and other sensitive receptors as well as specifying placement of inverters within the Facility fence line to decrease potential noise impacts offsite (see Exhibit 7).

Section 94-c regulations require public input into the environmental review of proposed development projects so that potential adverse impacts can be identified prior to

development and can be avoided, minimized, or mitigated to the maximum extent practicable. As shown throughout the Section 94-c Application and described herein, the Facility has been designed to avoid, minimize, and mitigate potential adverse impacts to the maximum extent practicable.

Beyond Section 94-c, compliance with other regulations governing the development, design, construction, and operation of the Facility also serve to minimize adverse impacts. The Project will comply with applicable federal, state, and substantive local regulations (that are not unreasonably burdensome – see Exhibit 24 (Local Laws and Ordinances) pertaining to the construction and operation of the Facility. Compliance with regulations will also serve to decrease the possibility of adverse impacts. In order to protect the safety of Facility workers and the public, construction activities and Project engineering will be conducted in compliance with applicable State and applicable local building codes and federal Occupational Safety and Health Administration (OSHA) guidelines.

Federal permitting required by the United States Army Corps of Engineers (USACE) will serve to protect federally regulated wetlands and other navigable waters of the United States under their jurisdiction. The State Pollutant Discharge Elimination System (SPDES) permit, issued by the New York State Department of Environmental Conservation (NYSDEC), is undertaken in conjunction with the Section 94-c process. To the extent required, municipal road use agreements and New York State Department of Transportation (NYSDOT) highway permits will be acquired to minimize safety traffic concerns and/or possible damage to roadways associated with the construction and operation of the Facility. The SPCC Plan (that will be completed and submitted as a compliance filing prior to construction and operation of the Facility) will protect against inadvertent spills during construction and operation. Road use, repair, and traffic control will be coordinated at the local level to assure that the safety of construction staff and of the traveling public is maintained.

(8) Proposed Mitigation Measures

The Project is not expected to result in public health or safety concerns associated with gaseous, liquid, or solid wastes. Routine inspection of material storage will be conducted to ensure compliance with BMPs and to mitigate potential impacts. For a detailed analysis of mitigation measures for a given resource, please see the following exhibits in this Application:

- Exhibit 7: Noise
- Appendix 7-10. Mill Point Solar I Noise Addendum Report
- Revised Exhibit 8: Visual
- Revised Exhibit 11: Terrestrial Ecology
- Revised Exhibit 12: NYS Threatened and Endangered Species
- Revised Exhibit 13: Water Resources
- Revised Exhibit 14: Wetlands
- Revised Exhibit 16: Transportation

(9) Proposed Impact Monitoring

The Applicant is committed to developing, constructing, and operating the Facility in a safe and environmentally responsible manner. In addition to the mitigation measures detailed above, an environmental compliance program will be implemented during Project construction where the Applicant will provide funding for an independent, third-party environmental monitor to oversee compliance with environmental commitments and permit requirements. In addition, the 94-c regulations specifically require monitoring to assess the impacts to terrestrial ecology (Revised Exhibit 11), water resources and aquatic ecology (Revised Exhibit 13), wetlands (Revised Exhibit 14), and agricultural resources (Revised Exhibit 15).

Prior to construction, quality assurance/quality control protocols will be implemented to monitor construction of the Facility and ensure that materials and equipment meet applicable standards. Once the Facility has been constructed, periodic inspections will be conducted as part of the Applicant's Facility Maintenance and Management Plan, prepared as a pre-construction compliance filing in accordance with Section 900-10.2 of the 94-c regulations. In addition to required environmental review, the inspections will examine photovoltaic (PV) panels for wear and tear and will report any issues at the inverters that could lead to a potential health or safety problem. Remote 24/7 monitoring will also provide operational security by identifying concerns early allowing Facility operators to preemptively address potential problems.

In addition, the Applicant will implement a Complaint Resolution Protocol that will consist of the following:

- The communications protocol and contacts for construction and operation;
- How to register a complaint;

- The process for gathering and analyzing information regarding the complaint;
- Complaint response and tracking;
- Complaint response follow-up; and
- Reporting the status of a complaint to ORES after follow-up.

6(b) Site Security Plan for the Operation of the Facility

The Site Security Plan (SSP) is provided as Revised Appendix 6-1 to this Application and describes the proposed security measures and procedures to be employed during Facility operation. Specifically, the SSP describes administrative and physical site security measures, access controls, electronic security and surveillance features, security lighting, and cyber security measures.

(1) Access Controls

Access controls during Facility operations and maintenance (O&M) are presented in the SSP. During operation, the Facility will typically be un-manned except for occasional O&M activities, and the Facility will be remotely monitored and controlled. The Applicant is evaluating third-party options to monitor and control the Facility from a remote-control center. Onsite O&M staff will conduct regular site inspections and periodic maintenance. All equipment and PV solar arrays will be located within fenced areas. In accordance with Section 5 (2)(b)(ii) of the Town of Glen Solar Law (Town of Glen 2022) (Revised Exhibit 24, Appendix 24-3), the perimeter fencing will be at least seven feet high and will allow for the movement of small wildlife by using fixed-knot woven wire or other wildlife-friendly fencing. Fencing for electrical and mechanical equipment will be at least seven feet high, as required by the National Electrical Code. 38 gated entrances will be established throughout the Facility Site. The Facility will be fenced and not open to the public and will be accessible only to Facility staff, vendors, suppliers, and other authorized personnel.

In accordance with Section 5(6)(l) of the Town of Glen Solar Law (Town of Glen 2022; Appendix 24-1), signage will be posted at access points and incrementally along the fenced perimeter. The signage will warn of no trespassing as well as provide safety information. The signs will be posted at a prominent location on each tax map property participating in the Project at a size of 3'x3' or greater and will clearly indicate the following: the owner of the site, address, phone contact, site GPS and site address, and the party who is responsible for site maintenance and any other entity that may own parts of the complex (i.e., transmission lines to the grid, fences, solar panels, and roadways). Contact information

will be updated each time a change in ownership or name occurs. Finally, a photograph of each sign posted will be filed with the Town of Glen Clerk.

(2) Electronic Security and Surveillance Facilities

Electronic security and surveillance are not proposed for the Facility. O&M staff will periodically evaluate security conditions and consider additional security measures if deemed necessary, such as video surveillance or motion detection cameras, in order to monitor activity in key storage areas and areas that require heightened security due to the location of certain Facility components. If warranted, photocell activated infrared security cameras may be installed at storage areas and key perimeter risk areas.

(3) Security Lighting

During normal operations, most of the Facility will not be lit during nighttime hours. Within the onsite substation, manually operated lighting will be provided in compliance with the National Electrical Safety Code. It will not be activated except during nighttime O&M activities or in the case of an emergency response. Lighting near the perimeter and offsite receptors at the substation and/or Point of Interconnection (POI) switchyard will be directed downward and toward the interior of the Facility to the maximum extent practicable in order to minimize offsite light pollution. Onsite O&M work activities will generally be limited to daylight hours. In the rare cases when nighttime O&M work is required, work lights will be limited to only those small work areas and will be directed downward and away from offsite receptors, where possible. Temporary work area lighting will be shut down at night, unless required for security purposes. Specifications for lighting are presented in Revised Exhibit 5, Revised Appendix 5-1, Design Drawings.

(4) Lighting of Project Components to Ensure Aircraft Safety

Components greater than 200 feet in height are not proposed; therefore, aircraft obstruction lighting is not applicable, and the Facility will not compromise aircraft safety. The Applicant ran the FAA notice criteria tool for the Facility, results indicated that the Facility did not exceed Notice Criteria; results are included in Revised Exhibit 16, Appendix 16-10.

(5) Cyber Security Program

Facility O&M will comply with applicable North American Electric Reliability Corporation reliability standards. The SSP, included as Revised Appendix 6-1, describes the measures

planned to ensure the required cyber security. Periodic validation of compliance with the applicable standards by an independent auditor will be carried out as required by Section 900-2.7(b)(5).

6(c) Safety Response Plan

The Safety Response Plan (SRP), included as Revised Appendix 6-2, provides information and direction to Facility personnel and first responders regarding potential emergencies that may occur during the construction and operation of the Facility. The SRP was developed to support both Facility personnel and local responders in the event of a major emergency. The SRP identifies local first responders, Facility contacts, and utility infrastructure owners/operators located within the Facility and serves as a quick reference guide for responding during an emergency. The SRP provides a description of all onsite equipment and systems in compliance with the New York State Uniform Fire Prevention and Building Code. As permitted by Section 503 of Chapter 5 of the New York State Fire Code, the Applicant anticipates requesting limited exemptions from certain access road requirements under Chapter 5 of the Fire Code. The Applicant has met with local emergency responders and the Town to discuss compliance with the Fire Code and the Facility access road design. Overall, Facility access roads have been designed to provide safe and adequate access to the Facility while minimizing impacts to environmental resources, and the Applicant anticipates working with the Town to obtain any necessary exemptions and/or approvals.

The SRP focuses on both construction and operation and specifies procedures to follow in the event of an emergency as well as contingencies that would constitute a safety or security emergency such as a medical emergency, fire, explosion, severe weather, or physical security threat. The SRP lists onsite equipment and systems planned for use during construction and operation to aid in the prevention and response to fire and hazardous substance incidents. In accordance with Section 900-2.7(c)(1) – (7) the SRP includes detailed information regarding the following:

- Contingencies that would constitute a safety or security emergency;
- Emergency response measures by contingency;
- Evacuation control measures by contingency, including public evacuation if necessary;
- Community notification procedures by contingency;
- Onsite equipment and systems to prevent or handle fire emergencies and hazardous substance incident;

- Contingency plans to be implemented in response to the occurrence of a fire emergency, hazardous substance, or gas pipeline incident; and
- Local emergency response organization training.

6(d) Safety Response Plan and Site Security Plan Provision and Review Request

The Applicant has provided a copy of the plans required in Section 6(b) and 6(c) of this Exhibit to the New York State Division of Homeland Security and Emergency Services on January 5, 2024 and has requested that they review the plans and provide comments. Comments received on these documents will be addressed or incorporated into updated versions of these documents prior to initiation of Facility construction.

On February 2, 2023, the Applicant met in person with personnel associated with the Town of Glen Volunteer Fire Department (Glen Fire Department). At that time, the Glen Fire Department was introduced to the Facility layout, fence lines, fire access routes, fire breaks and buffers, and fire access road and turnaround widths. The Applicant requested feedback on the Glen Fire Department personnel count, current equipment, local water source and needs, and mutual aid response from surrounding fire departments. Following this meeting, the Glen Fire Department received the draft SSP and draft SRP via email from the Applicant. On October 19, 2023, via a phone call, the Applicant consulted and reviewed the documents with the Glen Fire Department. The Glen Fire Department had no comments regarding the draft SSP and SRP.

On October 13 and October 16, 2023, the Montgomery County Sheriff and the Montgomery County Emergency Management Office received the draft SSP and draft SRP via email from the Applicant. On October 25, 2023, the Applicant met in person with Montgomery County Sheriff's Office and over the phone with Montgomery County Emergency Management Office to review the draft documents. During this meeting and consultation, the concept of mutual aid and surrounding agency response was discussed, as well as the role of the Emergency Management Office. The Montgomery County Sheriff's office suggested edits to the draft documents, which have been incorporated by the Applicant (see Revised Appendix 6-1 and Revised Appendix 6-2).

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

The Facility is not proposed within any part of a city with a population over one million. Therefore, this requirement is not applicable. However, the Applicant has consulted with local emergency responders and relevant agencies regarding the proposed safety and security plans. The final

SRP will be provided to first responders prior to commencement of construction along with any subsequent updates.

6(f) References

New York State Energy Planning Board. 2015. New York State Energy Plan (SEP). Available online at: https://energyplan.ny.gov/Plans/2015. Accessed November 2023.

State of New York. 2019. Climate Leadership and Community Protection Act. Available online at: https://climate.ny.gov/. Accessed November 2023.

Town of Glen. 2022. Solar Law, Town of Glen. Available at: https://www.co.montgomery.ny.us/web/municipal/glen/documents/FinalAdoptedSolarLaw-5_2022.pdf. Accessed April 2023.